

RECORD OF DECISION

SAN JACINTO RIVER WASTE PITS

HARRIS COUNTY, TEXAS

EPA ID: TXN000606611



U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION 6

DALLAS, TEXAS

OCTOBER 2017

TABLE OF CONTENTS

	Page
LIST OF TABLES	ii
LIST OF FIGURES	iv
LIST OF ACRONYMS AND ABBREVIATIONS	vi
PART 1: THE DECLARATION.....	1
1.1 Site Name and Location	1
1.2 Statement of Basis and Purpose	1
1.3 Assessment of the Site.....	1
1.4 Description of the Selected Remedy	1
1.5 Statutory Determinations	2
1.6 Data Certification Checklist.....	2
1.7 Authorizing Signature	3
CONCURRENCE PAGE FOR RECORD OF DECISION	4
PART 2: THE DECISION SUMMARY	5
2.1 Site Name, Location and Brief Description	5
2.2 Site History and Enforcement Activities	5
2.3 Community Participation.....	11
2.4 Scope and Role of Response Action	13
2.5 Site Characteristics.....	13
2.6 Current and Potential Future Land and Resource Uses	26
2.7 Summary of Site Risks	28
2.8 Remedial Action Objectives.....	51
2.9 Description of Alternatives	53
2.10 Comparative Analysis of Alternatives	59
2.11 Principal Threat Wastes	68
2.12 Selected Remedy	68
2.13 Statutory Determinations	74
2.14 Documentation of Significant Changes.....	78
PART 3: RESPONSIVENESS SUMMARY	80
3.1 Stakeholder Issues and Lead Agency Responses	80
3.2 Technical and Legal Issues	80
REFERENCES.....	81

Appendix A Remedial Alternative Cost Development

LIST OF TABLES

<u>Number</u>	<u>Title</u>
1	Summary Statistics for Dioxin and Furan Concentrations in Surface Soil Samples from the TxDOT Right-of-Way and North of I-10
2	Summary Statistics for Dioxin and Furan Concentrations in Subsurface Soil Samples from the TxDOT Right-of-Way and North of I-10
3	Results of Groundwater Sampling North of I-10
4	Summary Statistics for Dioxin and Furan Concentrations in Surface Sediment Samples
5	Summary Statistics for Dioxin and Furan Concentrations in Subsurface Sediment Samples
6	Summary Statistics for Mercury, Aroclors, Dioxin-Like PCB Concentrations in Surface Sediment Samples
7	Summary Statistics for Mercury, Aroclors, Dioxin-Like PCB Concentrations in Subsurface Sediment Samples
8	Summary Statistics for Dioxins, Furans, PCBs, and Mercury in Edible Blue Crab Tissue from FCAs
9	Summary Statistics for Dioxins, Furans, PCBs, and Mercury in Hardhead Catfish Fillet Tissue from FCAs
10	Summary Statistics for Dioxins, Furans, PCBs, and Mercury in Edible Common Rangia (Clam) Tissue from FCAs
11	Summary Statistics for Dioxins, Furans, PCBs, and Mercury in Whole Gulf Killifish Tissue from FCAs
12	Summary Statistics for Dioxin and Furan Concentrations in Soil Investigation Area 4 and Adjacent Surface Soil Samples
13	Summary Statistics for Dioxin and Furan Concentrations in Soil Investigation Area 4 and Adjacent Subsurface Soil Samples
14	Summary Statistics for Dioxin and Furan Concentrations in Soil Investigation Area 4 and Adjacent Core Soil Samples
15	Summary Statistics for Chemical Concentrations in Groundwater Samples Collected from Soil Investigation Area 4

LIST OF TABLES (CONTINUED)

<u>Number</u>	<u>Title</u>
16	Baseline Human Health Risk Assessment Exposure Parameters Deterministic Evaluation for the Area North of I-10 and Aquatic Environment
17	Baseline Human Health Risk Assessment Exposure Scenarios for the Area North of I-10 and Aquatic Environment
18	Baseline Human Health Risk Assessment Exposure Parameters for Deterministic Evaluation for the Area South of I-10
19	Chemicals of Potential Ecological Concern Screening for Benthic Macroinvertebrate Community, North of I-10
20	Chemicals of Potential Ecological Concern Screening for Fish and Wildlife, North of I-10
21	Ecological Screening Results for Surface and Shallow Subsurface Soils for the Area South of I-10
22	Selection of Chemicals of Potential Ecological Concern for the Southern Impoundment
23	Summary of Ecological Receptor Surrogates for the Area North of I-10 and Aquatic Environment
24	Summary of Ecological Receptor Surrogates for the Area South of I-10
25	Summary of Lines of Evidence for Ecological Receptors and Assessment Endpoints for the Area North of I-10 and Aquatic Environment
26	Summary of Lines of Evidence for Ecological Receptors and Assessment Endpoints for the Area South of I-10

LIST OF FIGURES

<u>Number</u>	<u>Title</u>
1	Site Location
2	Site Overview
3	Time Critical Removal Action Vicinity Map
4	Habitats in the Vicinity of the Site
5	Conceptual Site Model Pathways for the Area North of I-10 and Aquatic Environment
6	Human Exposure Pathways for the Area North of I-10 and Aquatic Environment
7	Conceptual Site Model Pathways for the Area South of I-10
8	Human Exposure Pathways for the Area South of I-10
9	Distribution of TEQ in Soils of the TxDOT Right-of-Way and North of I-10
10	Distribution of TEQ _{P,M} (ND = ½ DL) in Soils of the TxDOT Right-of-Way
11	TEQ Concentrations in Surface Sediment
12	TEQ Concentrations in Sediment Cores
13	Distribution of TEQ _{P,M} (ND = ½ DL) in Surface Sediment
14	Distribution of TEQ _{P,M} (ND = ½ DL) in Sediment Cores
15	Fish Collection Area and Tissue Sampling Transects
16	Distribution of TEQ in Soil Investigation Area 4 and Adjacent Soils
17	Land Use in the Vicinity of the Site
18	Exposure Units for Sediment, Area North of I-10 and Aquatic Environment Baseline
19	Exposure Units for Fish and Shellfish Tissue, Area North of I-10 and Aquatic Environment

LIST OF FIGURES (CONTINUED)

<u>Number</u>	<u>Title</u>
20	Exposure Units for Soils, Area North of I-10 and Aquatic Environment, Baseline
21	Exposure Units for Sediment, Area North of I-10 and Aquatic Environment, Post-TCRA
22	Exposure Units for Soil, Area North of I-10 and Aquatic Environment, Post-TCRA
23	Plan View – Alternative 6N
24	Cross Sections A-A', B-B', C-C', and D-D' – Alternative 6N
25	Remedial Action Areas South of I-10

LIST OF ACRONYMS AND ABBREVIATIONS

95UCL °F	95 percent upper confidence limit degrees Fahrenheit
Anchor ARAR	Anchor QEA, LLC applicable or relevant and appropriate requirement
BERA BHHRA BMP	baseline ecological risk assessment baseline human health risk assessment best management practice
CDI CERCLA	chronic daily intake Comprehensive Environmental Response, Compensation, and Liability Act
CFR cfs COC COPC COPEC CWA cy	Code of Federal Regulations cubic feet per second chemical of concern chemical of potential concern chemical of potential ecological concern Clean Water Act cubic yard(s)
Dioxins	polychlorinated dibenzo-p-dioxins
EPA	U.S. Environmental Protection Agency
FCA FS furans	fish collection area feasibility study polychlorinated dibenzofurans
HI HpCDD HQ HxCDF	hazard index heptachlorodibenzo-p-dioxin hazard quotient hexachlorodibenzofuran
I-10 IC Integral IRIS	Interstate Highway 10 institutional control Integral Consulting Inc. Integrated Risk Information System
Mg/kg MNR MSL	milligram(s) per kilogram monitored natural recovery mean sea level
NCP	National Oil and Hazardous Substances Pollution Contingency Plan

LIST OF ACRONYMS AND ABBREVIATIONS (CONTINUED)

ng/kg	nanogram(s) per kilogram
NOAEL	no observed adverse effects level
NPL	National Priorities List
OCDD	octachlorinated dibenzo-p-dioxin
PCB	polychlorinated biphenyl
pg/kg	picogram(s) per kilogram
pg/L	picogram(s) per liter
RAO	remedial action objective
RfD	reference dose
RI	remedial investigation
ROD	Record of Decision
SF	slope factor
Site	San Jacinto River Waste Pits
SLERA	screening level ecological risk assessment
SPME	solid-phase micro extraction
S/S	solidification and stabilization
SVOC	semivolatile organic compound
TCEQ	Texas Commission on Environmental Quality
TCRA	Time Critical Removal Action
TCDD	tetrachlorodibenzo-p-dioxin
TCDF	tetrachlorodibenzofuran
TDSHS	Texas Department of State Health Services
TEQ	2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient
TEQ _{P, M}	dioxin-like PCB congeners toxicity equivalent quotient calculated using toxicity equivalency factors for mammals
TMDL	total maximum daily load
TOC	total organic carbon
TPWD	Texas Parks and Wildlife Department
TxDOT	Texas Department of Transportation
UAO	Unilateral Administrative Order
USACE	U.S. Army Corps of Engineers
USGS	U.S. Geological Society
VOC	volatile organic compound

This page intentionally left blank

PART 1: THE DECLARATION

1.1 SITE NAME AND LOCATION

The San Jacinto River Waste Pits Superfund Site is located in Channelview, Harris County, Texas. The U.S. Environmental Protection Agency (EPA) Superfund Database Identification Number is TXN000606611. This site is a single operable unit and areas and media within the site are addressed in this Record of Decision (ROD) document.

1.2 STATEMENT OF BASIS AND PURPOSE

This decision document presents the Selected Remedy for the San Jacinto River Waste Pits Site in Harris County, Texas. The Selected Remedy was chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), 42 U.S. Code §9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986; and, to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 Code of Federal Regulations (CFR) Part 300, as amended. This decision is based on the administrative record for the site, which has been developed in accordance with Section 133(k) of CERCLA, 42 U.S. Code §9613(k).

The State of Texas, acting through the Texas Commission on Environmental Quality (TCEQ), was provided the opportunity to review and comment on the Selected Remedy.

1.3 ASSESSMENT OF THE SITE

The response action selected in this ROD is necessary to protect the public health or welfare or the environment from actual or threatened releases of hazardous substances into the environment and pollutants or contaminants, which may present an imminent and substantial endangerment to the public health or welfare.

1.4 DESCRIPTION OF THE SELECTED REMEDY

The Selected Remedy is a final action for the San Jacinto River Waste Pits Site. It addresses site related unacceptable human health risks associated with consumption of fish and direct contact (skin contact and incidental ingestion) with the waste material. It also addresses site related ecological risks to bottom-dwelling organisms (benthic invertebrates) from exposure to sediment and waste material.

The overall strategy for addressing contamination at the Site includes excavation and off-site disposal of principal threat waste source materials (i.e., potentially highly mobile under Site conditions and highly toxic waste material) from impoundments in and adjacent to the San Jacinto River. Institutional Controls (ICs) will be used to prevent disturbance of the remediated areas (e.g., dredging, anchoring, construction, and excavation) and alert future property owners of subsurface materials exceeding cleanup goals. Monitored natural recovery (MNR) will be used for sediment in the sand separation area to ensure remedy protectiveness in the aquatic environment. The Selected Remedy includes the following major components:

- Removal of a portion of the existing temporary armored cap installed under the time-critical removal action (TCRA).
- Removal of approximately 162,000 cubic yards (cy) of waste material exceeding the paper mill waste material cleanup goal of 30 nanograms per kilogram (ng/kg) 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD) toxicity equivalent quotient (TEQ) that is located beneath the armored cap.
- Excavation of approximately 50,000 cy of waste material exceeding the paper mill waste material and soil cleanup goal of 240 ng/kg TEQ to a depth of 10 feet below grade in the peninsula south of I-10.

1.5 STATUTORY DETERMINATIONS

The selected remedy meets the requirements for remedial actions set forth in Section 121 of CERCLA, 42 U.S.C. § 9621, because it meets the following requirements: 1) it is protective of human health and the environment; 2) it meets a level or standard of control of the hazardous substances, pollutants and contaminants that at least attains the legally applicable or relevant and appropriate requirements under federal and state laws (unless a statutory waiver is justified); 3) it is cost-effective; and 4) it utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable.

In addition, Section 121 of CERCLA includes a preference for remedies that employ treatment that permanently and significantly reduce the volume, toxicity or mobility of hazardous substances as a principal element (or justify not satisfying the preference). The selected remedy may satisfy the preference for treatment to the extent that contaminated material requires treatment prior to land disposal.

This remedy will result in hazardous substances, pollutants, or contaminants remaining at the Site above levels that will not allow for unlimited use and unrestricted exposure. Pursuant to Section 121(c) of CERCLA, statutory reviews will be conducted no less often than once every five years after the initiation of construction to ensure that the remedy is, or will be, protective of human health and environment. If justified by the review, additional remedial actions may be implemented to remove, treat, or contain the contaminants.

Data Certification Checklist

The following information is included in the Decision Summary section of this ROD. Additional information can be found in the Administrative Record file for this site.

- A discussion of the nature and extent of contamination is included in the "Summary of Site Characteristics" section (Section 2.5).
- Chemicals of concern (COCs) and their respective concentrations (Sections 2.5)

- Baseline risks for human health and the environment represented by the COCs (Section 2.7)
- Cleanup levels established for COCs and the basis for these levels (Section 2.8)
- How source materials or highly toxic materials constituting principal threat wastes are addressed (Section 2.12).
- Current and reasonably anticipated land use assumptions and current and potential future beneficial uses of groundwater used in the baseline risk assessment and the ROD (Section 2.6)
- Potential land and groundwater use that will be available at the site as a result of the Selected Remedy (Section 2.12)
- Estimated capital; annual operation and maintenance; and total present worth costs, discount rate, and the number of years over which the remedy cost estimates are projected (Section 2.12)
- Key factors that led to selecting the remedy (i.e., describe how the Selected Remedy provides the best balance of tradeoffs with respect to the balancing and modifying criteria, highlighting criteria key to the decision) (Section 2.10).

1.6 AUTHORIZING SIGNATURE

This ROD documents the Selected Remedy for the San Jacinto River Waste Pits Site. This remedy was selected by the EPA after consultation with the TCEQ.

By: _____ Date: _____

Scott Pruitt
Administrator
U.S. Environmental Protection Agency

CONCURRENCE PAGE FOR RECORD OF DECISION

San Jacinto River Waste Pits Site

Gary Miller, Remedial Project Manager
Arkansas/Texas Section

Date

Carlos Sanchez, Chief AR/TX Section
Arkansas/Texas Section

Date

John Meyer, Director
Superfund Remedial Branch

Date

Ann Foster, Assistant Regional Counsel
Regional Counsel Superfund Branch

Date

Mark A. Peycke, Chief
Regional Counsel Superfund Branch

Date

Pamela Phillips, Deputy Director
Superfund Division

Date

PART 2: THE DECISION SUMMARY

This Decision Summary provides a description of the site-specific factors and analyses that led to the Selected Remedy. It includes background information, the nature and extent of contamination, assessment of human health and environmental risks posed by contamination, and identification and evaluation of remedial action alternatives for the site.

2.1 SITE NAME, LOCATION AND BRIEF DESCRIPTION

The San Jacinto River Waste Pits Site is located in Harris County Texas (Figure 1) east of the City of Houston, between two unincorporated areas known as Channelview and Highlands. The National EPA Superfund Database Identification Number is TXN000606611. The EPA is the lead agency and the TCEQ is the support agency.

The site consists of a set of impoundments built in the mid-1960s for the disposal of solid and liquid pulp and paper mill wastes, and the surrounding areas containing sediments and soils impacted by waste materials disposed of in the impoundments. In 1965 and 1966, pulp and paper mill wastes (both solid and liquid) were transported by barge from the Champion Paper Inc. paper mill in Pasadena, Texas, and deposited in the impoundments. The northern set of impoundments, approximately 14 acres in size, are located on a partially submerged 20-acre parcel on the western bank of the San Jacinto River, immediately north of the I-10 bridge over the San Jacinto River (Figure 2). Currently, approximately half of the northern 20-acre parcel, including the abandoned waste disposal ponds, is now submerged below the adjacent San Jacinto River's water surface.

The area receives an average of 50 inches of rain annually. The Site may be affected by tides, winds, waves, and currents resulting from extreme weather conditions such as strong storm winds, flooding, tornadoes, and hurricanes, which may cause a potential release or migration of dioxin and furan contaminated materials.

The southern impoundment, less than 20 acres in size, is located on a small peninsula that extends south of I-10. The primary hazardous substances documented at the Site are polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans. Physical changes at the site during the 1970s and 1980s, including regional subsidence of land in the area due to large scale groundwater extraction resulted in partial submergence of the northern impoundments and exposure of the hazardous substances in the impoundments to surface water of the San Jacinto River.

A Time Critical Removal Action (TCRA) to address the hazardous substances associated with the impoundments north of I-10 was completed in July 2011. The TCRA included the installation of geotextile and geomembrane underlayments in certain areas and a temporary armored cap. The purpose of the temporary cap is to prevent the hazardous substances from washing into the river and to prevent the recreational use of the northern impoundments that had been occurring.

2.2 SITE HISTORY AND ENFORCEMENT ACTIVITIES

This section provides background information on past activities that have led to the current contamination at the site, and federal and state investigations and cleanup actions conducted to date under CERCLA.

2.2.1 Historical Activities

In the 1960s, McGinnes Industrial Management Corporation transported liquid and solid pulp and paper mill wastes by barge from the Champion Papers Inc. paper mill in Pasadena, Texas to impoundments located north and south of I-10, adjacent to the San Jacinto River, where the waste was stabilized and disposed. Champion Papers Inc. business records indicate the paper mill produced pulp and paper using chlorine as a bleaching agent (EPA 2009). The pulp bleaching process forms dioxins and furans as a by-product. Historical activities for each area are discussed below.

Northern Impoundments

Impoundments were built by constructing berms prior to 1965 within the estuarine marsh to the west of the main channel of the San Jacinto River, just north of what was then Texas State Highway 73 and is now 1-10. The impoundments were divided by a central berm running lengthwise (north to south) through the middle, and were connected with a drain line to allow flow of excess water (including rain water) from the impoundment located to the west of the central berm into the impoundment located to the east of the central berm. The excess water collected in the impoundment located to the east of the central berm was supposed to be pumped back into barges and taken off-site (Anchor and Integral 2010).

On December 27, 1965, the Harris County Health Department observed pumping of liquid waste out of one of the ponds directly into the San Jacinto River (EPA 2009). The Harris County Health Department instructed McGinnes Industrial Management Corporation and Champion Papers, Inc. by letter to stop discharging to the San Jacinto River and demanded that the levees surrounding the impoundments be repaired (EPA 2009). An internal memo, dated 30 December 30, 1965, from Champion Papers Inc. confirmed water seepage along the levees and that portions of the levees required reinforcement (EPA 2009).

In May 1966, the Texas Department of Health investigated Champion Papers Inc. waste disposal practices. Seepage was noted on the western waste pond and deteriorating levees on the eastern waste pond. The Texas Department of Health also noted that storm events had the potential to cover the disposal area with water and wash out the levees.

On July 29, 1966, the Texas Water Pollution Control Board granted McGinnes Industrial Management Corporation permission to release a combination of stabilized waste water and rain water from waste ponds into the San Jacinto River. It was also noted that the waste ponds would no longer be used for the storage of waste material (EPA 2009).

Physical changes at the site in the 1970s and 1980s, including regional subsidence of land in the area due to large scale groundwater extraction and sand mining within the river and marsh to the west of the northern impoundments, have resulted in partial submergence of the impoundments

north of I-10 and exposure of the contents of the impoundments to surface waters. During the mid- to late 1990s, third-party dredging likely occurred in the vicinity of the perimeter berm at the northwest corner of the northern impoundments.

A release of the hazardous substances from the northern impoundments was identified through site assessment activities conducted by EPA and TCEQ in 2006. Site assessment activities included surface water and sediment sampling for the presence of dioxins and furans. People and animals coming on to the site could be exposed to these contaminants through ingestion, skin contact and inhalation pathways. Further, during a site visit by EPA conducted on March 1, 2010, releases of hazardous substances were observed entering the San Jacinto River from the northern impoundments.

Southern Peninsula

The peninsula south of I-10 has a complicated history that includes evidence of disposal of paper mill waste, disposal of anthropogenic waste, and subsequent industrial activities. An impoundment located on the southern peninsula and used for disposal of paper mill waste was likely constructed sometime between 1962 and 1964, based on evidence of berms visible in historical photos. The oldest aerial photo that contains evidence of the construction of berms is from 1964. The berms that seem to define an impoundment, appear to have been formed in the same manner as the impoundments north of I-10, with sidecast from trenching providing the berms of the impoundment that ultimately contained the waste. The extent of the area potentially affected by waste disposal in the southern impoundment is uncertain, but is most likely within the area enclosed by the berms.

The impoundment on the southern peninsula was also used for dumping of various anthropogenic wastes (e.g., wood, plastic sheeting, paint chips, ceramic shards) since at least the early 1970s. Aerial photographs and anecdotal information indicate that the impoundment berms were still visible in 1972, when the current landowner's family purchased the property on which they were located. Soon after 1972, the impoundment berms were graded down. The entire peninsula south of I-10 was subject to continuous and significant modification from the early 1970s through the 1980s. From 1985 to 1998, Southwest Shipyards leased a portion of the western shoreline of the southern peninsula, immediately to the south of the present-day location of Glendale Boat Works operations on property owned by New Lost River, LLC. This area includes the shoreline area that appears to be flooded in the 1973 aerial photograph and that was filled in by 1984. Southwest Shipyards conducted sandblasting and painting of barges in this area, and spent blast sand was stockpiled along an unknown portion of the shoreline. Aerial photographs provide evidence of deposition and transport of large volumes of material, significant changes in the form of the landscape, and continuous physical change from at least 1972 to the present.

2.2.2 Pre-CERCLA Investigations

Between 1993 and 1995, the City of Houston conducted a toxicity study of the Houston Ship Channel that included the San Jacinto River in accordance with the Consent Decree between EPA and the City of Houston. Sediment, fish, and crab samples were collected in August 1993

and May 1994. Sediment, fish, and crab samples collected near the site indicated elevated dioxin and furan levels (ENSR Consulting and Engineering and Espey, Huston and Associates 1995). Between 2002 and 2004, the TCEQ conducted a study of total maximum daily loads (TMDL) for dioxins and furans in the Houston Ship Channel (University of Houston, Parsons Engineering, and PBS&J 2004). Sediment, fish, and crab samples were collected in the summer of 2002, fall 2002, spring 2003, and spring 2004. The data indicated the continued presence of dioxin and furan contamination in the San Jacinto River surrounding the site. Results indicated that the human health-based standard was exceeded by 97 percent of fish samples and 95 percent of crab samples (Anchor and Integral 2010).

In April 2005, the Texas Parks and Wildlife Department (TPWD) sent a letter notifying TCEQ of the existence of former waste pits in a sandbar in the San Jacinto River north of I-10. The letter included discussion of anecdotal evidence, data collected during the Houston Ship Channel Toxicity Study (ENSR Consulting and Engineering and Espey, Huston and Associates 1995) and TMDL study (University of Houston, Parsons Engineering, and PBS&J 2004), documentation of U.S. Army Corps of Engineers (USACE) dredge and fill permits in the area, and requested that TCEQ further investigate the site (TPWD 2005).

A preliminary assessment and screening site inspection was conducted between 2005 and 2006 to determine if the site was eligible for proposal to the National Priorities List (NPL) (TCEQ 2005). Site reconnaissance identified the surface water pathway as the primary pathway of concern. Seventeen sediment samples were collected from the San Jacinto River to evaluate background, potential source areas, and possible releases. Samples were analyzed for semivolatile organic compounds (SVOCs), pesticides, PCBs, dioxins and furans, and metals. Sediment sample results indicated elevated concentrations of dioxin congeners. The former surface impoundments were identified as the source of hazardous substances at the site (TCEQ 2006).

The Hazard Ranking System is the principal mechanism the EPA uses to place sites on the NPL. The Hazard Ranking System Documentation Record for the site was published by TCEQ in 2007. The site score was 50 because of components of the surface water overland/flood migration pathway (TCEQ 2007). Any site scoring 28.5 or greater is eligible for the NPL (EPA 1992).

2.2.3 National Priorities List

The site was proposed for listing on the NPL List on September 19, 2007 (72 FR 53509), and was placed on the list effective April 18, 2008 (73 FR 14719).

2.2.4 Unilateral Administrative Order for Remedial Investigation/Feasibility Study

On July 17, 2009, EPA sent a Special Notice Letter to the International Paper Company, Inc. and McGinnes Industrial Management Corporation offering them an opportunity to negotiate and enter into an Administrative Order on Consent covering the performance of a Remedial Investigation (RI)/Feasibility Study (FS) for the site. EPA did not receive a Good Faith Offer to begin negotiations for a RI/FS for the site (EPA 2009).

On November 20, 2009, EPA issued Unilateral Administrative Order (UAO) CERCLA Docket No. 06-03-10 to the International Paper Company, Inc. and McGinnes Industrial Management Corporation. The International Paper Company, Inc. is the successor to Champion Papers, Inc., who arranged for the disposal or treatment of materials containing hazardous substances that were disposed of at the site (EPA 2009). McGinnes Industrial Maintenance Corporation operated the waste disposal facility at the time of disposal of hazardous substances at the site (EPA 2009). The UAO directed International Paper Company, Inc. and McGinnes Industrial Management Corporation to conduct a RI/FS in accordance with provisions of the order, CERCLA, the NCP, and EPA guidance. EPA also required the investigation of an impoundment located south of I-10 because historical documents indicate that waste disposal activities occurred in this area (Integral and Anchor 2013a).

2.2.5 Administrative Settlement Agreement and Order on Consent for Removal Action

On July 28, 2010, EPA issued a Decision Document to perform a TCRA to temporarily abate the release of contaminants including dioxins and furans into the San Jacinto River from the northern impoundments until the Site was fully characterized and a remedy selected and implemented.

On 11 May 2010, EPA filed the Administrative Settlement Agreement and Order on Consent for Removal Action, CERCLA Docket No. 06-12-10 (EPA 2010b). The Administrative Settlement Agreement and Order on Consent was entered into voluntarily by the EPA, International Paper Company, Inc., and McGinnes Industrial Management Corporation. The Administrative Settlement Agreement and Order on Consent for Removal Action provided for the performance of a removal action and the reimbursement of certain response costs.

The EPA Action Memorandum required that the TCRA stabilize the impoundments to withstand forces sustained by the river, including a cover design that considered storm events with a return period of 100 years (Figure 3). The EPA Action Memorandum also required that the TCRA prevent direct human and benthic organism contact with waste materials. The TCRA actions were required to be consistent with the long-term remediation strategies that may be developed for the site.

Elements of the selected TCRA included construction of a perimeter fence on the uplands to prevent unauthorized access, placement of warning signs around the perimeter of the impoundments and on the perimeter fence, design and implementation of an operations, monitoring, and maintenance plan, and installation of the following items:

- A stabilizing geotextile underlayment over the eastern cell
- An impervious geomembrane underlayment in the western cell
- A granular cover over the northwestern area of the western cell
- A granular cover above the geotextile and geomembrane in the western cell
- A granular cover above the geotextile in the eastern cell.

Additionally, the western cell received treatment through stabilization and solidification of approximately 6,000 cy of material in the upper 3 feet of material.

From December 2010 through July 2011, TCRA construction activities were completed at the site. On 1 August 2011, EPA conducted a final site walk through accompanied by International Paper Company, Inc., McGinnes Industrial Management Corporation, Anchor, and USA Environment, LP. The *Revised Final Removal Action Completion Report*, which documents the TCRA construction activities, was completed May 2012 (EPA 2012).

The *Operations, Monitoring, and Maintenance Plan, Time-Critical Removal Action, San Jacinto River Waste Pits Superfund Site* identifies continuing obligations, including monitoring and maintenance, with respect to the TCRA (Anchor 2011). Inspections of fencing, signage, and the protective armored cap are required quarterly for the first 2 years following completion of the TCRA (January 2012 through December 2013), semiannually for years three to five (April 2014 through October 2016), and annually starting at year six (July 2017 and beyond). **Add inspection frequency increase here** Inspections of the armored cap are also required following the first 25-year flow event and after each 100-year flow event. TCRA inspection events include:

- Visual inspection of the security fence and signage surrounding the site
- Visual inspection of the armored cap located above the water surface
- Visual observation that waste materials are not actively eroded into the river
- Collection of topographic survey data for the portions of the armored cap that are located above the water surface or at a water depth too shallow to access by boat
- Collection of bathymetric survey data for the portions of the armored cap that are below the water surface and accessible by boat
- Manual probing of armored cap thickness at areas identified by the topographic or bathymetry surveys as more than 6 inches lower in elevation than during the prior survey.

If the visual inspection identifies a breach in the security fence or damaged or missing signs, repairs or replacement will be made as soon as practicable, but not to exceed two weeks following the inspection. Repair activities to the armored cap are required if (1) the thickness of the armored cap is less than 6 inches than the thickness specified by the TCRA design over a contiguous area greater than 30 feet by 30 feet in size, (2) the armored cap has any area of complete absence, or (3) visual observation indicates that waste materials are being actively eroded into the river. Inspection and repair reports, as needed, are submitted to EPA. Since its completion in July 2011, the armored cap has generally isolated and contained impacted material. The following events, summarized in the FS (EPA 2016), have been documented since the time of armored cap installation:

- In July 2012, an area along the western berm slope was noted to have areas where cap armor materials had moved down the slope, uncovering a small area of the geotextile layer (approximately 200 square feet, or 0.03 percent of the armored cap footprint). There was no exposure of underlying materials or release of hazardous substances associated with this temporary condition. Maintenance measures were completed that involved grading specific locations to an overall flatter condition by placing additional armor rock over the cap surface in those locations.
- In January 2013, five areas in the eastern cell of the cap with less than the required armor cover thickness and/or exposed geotextile were identified. In one of those areas there is a need for placement of geotextile fabric in addition to armor stone. The cause of these areas of deficient cap cover is unknown. These areas were repaired in January 2013 with the addition of additional stone and geotextile.

- In response to USACE recommendations following their post-construction evaluation (USACE 2013) of the armored cap, additional cap enhancement work was completed in January 2014. In order to address the factor of safety, slope of the face of the berm, and uniformity of cap material, additional stone was placed on the armored cap.
- On 9 and 10 December 2015, EPA performed an underwater inspection that identified an area of deficient thickness and/or missing armor cover resulting in exposure of the underlying paper mill waste material to the San Jacinto River. The deficient area, approximately 22 feet by 25 feet, was located on the northwestern section of the armored cap where no geotextile was installed. Armored rock cover was still present, but coverage was not complete and was not of adequate thickness. The cause of the deficient area is unknown. Sediment sampling completed in December 2015 identified dioxins and furans in the exposed sediment as high as 43,700 ng/kg TEQ. Maintenance activities to place geotextile and additional rock cover over and extending beyond the deficient area were completed on 4 January 2016.
- On 24 February 2016, during an extremely low tide, a visual inspection of the cap was performed. A large majority of the eastern cell was exposed during this abnormally low tide event. Five small areas (approximately 1 foot by 3 feet at the largest areas) of exposed geotextile with no rock cover were observed in the central part of the eastern cell where the cap should have had a 1-foot thickness minimum. The cause of these deficient rock areas is unknown, although some of the areas may have been geotextile overlap portions associated with the cap construction. During March 2016 probing of the entire eastern cell of the cap to check thickness was completed and identified additional areas of deficient armor cover thickness and/or exposed geotextile. Rock was added to all of these areas in the eastern cell in March 2016 to achieve a minimum thickness of 1 foot.

2.3 COMMUNITY PARTICIPATION

This section of the ROD describes the EPA's community involvement and participation activities. EPA has been actively engaged with stakeholders and has encouraged community participation during EPA's remedial and removal activities. These community participation activities during the remedy selection process meet the public participation requirements in CERCLA 300.430(f)(3) and the NCP.

2.3.1 *Community Involvement Plan*

The Community Involvement Plan is central to Superfund community involvement. It specifies the outreach activities that the EPA undertakes to address community concerns and expectations. The Community Involvement Plan included background information on the community, community issues and concerns, community involvement activities, communication strategy, official contact list, and local media contacts. **Add date of latest CIP.**

2.3.2 Community Meetings and Fact Sheets

The EPA and TCEQ have conducted community meetings during the course of the Superfund process. In addition, factsheets detailing site activities have been published periodically since the site was listed on the NPL and are available in the Administrative Record.

The Proposed Plan community meeting was held at the [ENTER LOCATION] on [ENTER DATE]. The Proposed Plan presented the EPA's rationale for the Preferred Remedy. A public comment period for the Proposed Plan was held from [ENTER DATE] until [ENTER DATE]. A public notice of the community meeting and public comment period was published in the [ENTER NAME OF PUBLICATION] on [ENTER DATE]. Additionally, a fact sheet announcing the comment period and meeting was mailed to the contacts included on the site's mailing list.

This section to be updated after the community meeting, suggested language per EPA guidance as follows "At the community meeting, representatives from the EPA provided a presentation on the Proposed Plan and answered questions about EPA's Preferred Alternative. Representatives from the TCEQ were also present at the meeting. Oral and written comments were accepted at the meeting and a court reporter transcribed the discussions held during the meeting. This transcript is included in the Administrative Record file for the site. The EPA's responses to the comments received during the public comment period are included in Part 3: Responsiveness Summary."

2.3.3 Information Repositories

The Administrative Record file is available for review at:

Highlands Public Library

Stratford Branch Library
509 Stratford Street
Highlands, Texas 77562
(281) 426-3521

U.S. Environmental Protection Agency, Region 6

1445 Ross Avenue, Suite 700
Dallas, Texas 75202
(800) 533-3508

Texas Commission on Environmental Quality

Building E, Records Management, First Floor
12100 Park 35 Circle
Austin, Texas 78753
(512) 239-2900 and (800) 633-9363

2.4 SCOPE AND ROLE OF RESPONSE ACTION

The NCP, 40 CFR Section 300.5, defines an operable unit as a discrete action that comprises an incremental step toward comprehensively addressing a site's contamination problems. The cleanup of a site may be divided into one or more operable units, depending on the complexity of the problems associated with the site. The EPA has chosen to address the site as a whole without division into operable units. The selected remedy addresses the contaminated environmental media at the site with the primary objectives of preventing human exposure to contaminants, preventing or minimizing further migration of contaminants. The remedial action objectives (RAOs) are described in more detail in Section 2.8.

2.5 SUMMARY OF SITE CHARACTERISTICS

This section presents a brief, comprehensive overview of the site. This section has been divided into three subsections that include physical characteristics, conceptual site model, and the nature and extent of contamination.

2.5.1 Physical Characteristics

This subsection provides a summary of site surface features, climate, surface water hydrology, geology, ecology, and habitats. Detailed information on these topics can be found in the *Remedial Investigation Report, San Jacinto River Waste Pits Superfund Site* (Integral and Anchor 2013a).

Surface Features

The site is located in the estuarine portion of the lower San Jacinto River where the river begins to transition from a fluvial system to a deltaic plain. The northern impoundments cover an area approximately 15.7 acres in size. Pre-TCRA ground surface elevations ranged from 0 feet above mean sea level (MSL) at the shoreline, to less than 10 feet above MSL. South of I-10, ground surface elevations range from 0 feet above MSL at the shoreline to nearly 13 feet above MSL. Both areas are generally flat with very little noticeable topographic relief. Relief south of I-10 is likely result of building foundations and leftover cut material from grading.

Climate

The climate along the Gulf Coast of Texas and the area surrounding Houston is humid subtropical. The average annual precipitation is 54 inches. The warmest month is July, with an average temperature of 85 degrees Fahrenheit (°F), and the coldest month is January, with an average temperature of 54°F. During the spring season, large thunderstorms are common and are capable of producing tornados. The transition to the summer months is characterized by mild temperatures, but relative humidity of up to 90 percent results in a higher heat index.

The monthly average precipitation varies from approximately 2.5 inches in February to over 7 inches in June. It is not uncommon to have precipitation events that exceed

2 inches per day, and rain events bringing 10 inches of precipitation or higher in a day occur on a decadal scale. These types of precipitation events produce wide variations in the volume of discharge into and out of the San Jacinto River and may significantly affect variations in flow velocities, sediment transport, and suspended sediment loads.

Tropical weather systems can have tremendous impacts on regional precipitation and hydrology along the Gulf Coast. Hurricane season runs from June 1 to November 30. The north Texas Gulf Coast has recently documented major storms (Category 3 to 5) in 2005 and 2008.

Surface Water Hydrology

Flow rates in the San Jacinto River at the site are partially controlled by the Lake Houston dam, which is located about 16 river miles upstream of the northern impoundments. The average flow in the river is 2,200 cubic feet per second (cfs). Floods in the river occur primarily during tropical storms (e.g., hurricanes) or intense thunder-storms. Extreme flood events have flow rates of 200,000 cfs or greater. Floods can cause water surface elevations to increase by 10 to 20 feet or more (relative to average flow conditions). A flood in October 1994 had a peak discharge of 360,000 cfs, which has a return period of greater than 100 years; the river stage height during the October 1994 flood had a maximum value of 27 feet above MSL at the Sheldon gauge station located about 6 miles upstream from the Site.

The river in the vicinity of the northern impoundments is affected by diurnal tides, with a typical tidal range of about 2 feet. Tidal range varies over a 14-day cycle, with neap and spring tide conditions corresponding to minimum and maximum tidal ranges, respectively. Tropical storms and wind storms from the north can have significant effects on water levels. Hurricane storm surges usually cause increases in water depth of 4 to 6 feet. Storms with strong winds from the north can cause water to be transported out of the Galveston Bay system which can result in water levels that are much lower than low tide elevations.

Salinity in the vicinity of the site ranges between 10 and 20 parts per trillion during low to moderate flow conditions in the river. During floods, salinity values will approach freshwater conditions.

Regional Geology and Hydrogeology

Sediments of the Texas Gulf Coast are generally Cenozoic fluvial-deltaic to shallow-marine deposits of a coastal plain environment (U.S. Geological Society [USGS] 2002). Sea-level transgression-regression cycles and natural basin subsidence have produced beds of clay, silt, sand, and gravel that gently dip southeast towards the Gulf of Mexico. This complex depositional process created both a continental assemblage of sediments that now makes up the aquifers within the area and a marine sequence of sediments that contains clay layers and confining units. This process resulted in a regional aquifer system with a high degree of heterogeneity in both lateral and vertical extent

(USGS 2002) commonly referred to as the Gulf Coast Aquifer System (Texas Natural Resource Conservation Commission 1999).

The Gulf Coast Aquifer System is located along the coast of the Gulf of Mexico and has been divided into four units: the Chicot, Evangeline, and Jasper aquifers, and the Burkeville confining unit. The site is above the Evangeline (deeper) and Chicot (shallower) aquifers. Groundwater elevation maps for the Evangeline and Chicot aquifers show that regional groundwater flow is directed approximately southeast towards the Gulf of Mexico (USGS 2002). On a localized net flow basis, shallow groundwater may discharge to the San Jacinto River, providing a portion of base flow. Under high tide and river flow conditions, a temporary gradient reversal may cause the San Jacinto River to temporarily recharge the shallow alluvium adjacent to the river.

The Chicot Aquifer is used as a drinking water source within the greater Houston area, but water used from this source is pumped from wells screened far below the Beaumont Formation, a confining clay. Although there are some privately owned upper Chicot Aquifer wells near the site, the infiltration of surface waters or shallow groundwater would likely be prevented by the thick sequence of the clay and silt deposits of the Beaumont Formation, effectively isolating the lower portion of the Chicot Aquifer from shallower groundwater and surface water in the vicinity (USGS 2002).

Local Geology and Hydrogeology

At the site, the surface and underlying local soils include Holocene alluvial deposits and the Beaumont Formation, which is the youngest and uppermost of the series of coast-parallel Pleistocene deposits that make up the Gulf Coast Aquifer System. The soils of the Beaumont Formation are dominated by clays and silts that thicken seaward and that were deposited in a fluvial-deltaic environment (Van Siclen 1991). The Beaumont formation and overlying recent alluvial soils make up the uppermost units of the Chicot Aquifer (USGS 2002).

The local water table (i.e., shallow groundwater) is found near land surface in the shallow alluvium sediments, generally at the approximate elevation of the San Jacinto River water surface. Groundwater movement in the shallow alluvium in the area is dominated by surface water and groundwater interactions with the river, which surrounds the former impoundments north of I-10 and the area to the south. This reach of the San Jacinto River watershed is characterized by extremely flat groundwater gradients indicating that the area surrounding the site is an area of minimal recharge to the aquifers. The Beaumont Formation is a confining unit that isolates shallow groundwater in the Holocene alluvium and in the San Jacinto River sediments from the underlying formations of the Chicot Aquifer.

Habitats Overview

The site is located in a low-gradient, tidal estuary near the confluence of the San Jacinto River and the Houston Ship Channel. Upland, riparian, and aquatic habitats are present.

Upland natural habitat adjacent to the San Jacinto River at and near the site is generally low-lying, with little topographic variation, and consists primarily of clay and sand that supports forest communities of loblolly pine-sweetgum, loblolly pine-shortleaf pine, water oak-elm, pecan-elm, and willow oak-blackgum (Texas State Historical Association 2009). Upland natural habitat occurs along narrow sections of land on either side of the river, as well as on several small islands, to the north and south of I-10 and east of the northern impoundments. Most of these islands are vegetated with a mixture of shrubs and trees, with fringing shallow waters.

Habitats on the northern portion of the site include shallow and deep estuarine waters, and shoreline areas occupied by estuarine riparian vegetation. The in-water portion of the site is unvegetated, with a deep (20- to 30-foot) central channel and shallow (3 feet or less) sides (National Oceanic and Atmospheric Administration 1995; Clark et al. 1999). Except in the northern impoundments, sediments have a high sand content and are characterized by low organic matter content (0.5 and 2 percent TOC). By contrast, most surface sediment samples collected within the northern impoundments ranged between 1 and 5 percent TOC, with the fraction consisting of sand ranging from 4 to 98 percent, and an average of about 50 percent sands.

A sandy intertidal zone is present along the shoreline throughout much of the site. Minimal habitat is present in the upland sand separation area located adjacent to the northern impoundments, because demolition and closure of this former industrial area created a denuded upland with a covering of crushed cement and sand. The sandy shoreline of this area is littered with riprap, other metal debris, and piles of cement fragments. Prior to implementation of the TCRA, estuarine riparian vegetation lined the upland area that runs parallel to and north of I-10. As a result of the TCRA, that area now includes a dirt road. The western cell of the impoundments north of I-10 had been occupied by estuarine riparian vegetation to the west of the central berm until the recent implementation of the TCRA, when the vegetation was removed. The eastern cell, also completely covered as a result of the TCRA, lies within intertidal and subtidal habitats.

Throughout the broader surrounding area, there are approximately 55 additional acres of freshwater, estuarine, and marine wetlands (Figure 4). The vegetation associated with the estuarine intertidal wetland documented on the northern impoundments is no longer present as a result of the TCRA, but could return over time. Major vegetation associated with fringe wetland areas included broadleaf cattail, saltmeadow cordgrass, saltmarsh aster, and marsh elder. Wetland habitats to the south of I-10 along the eastern side of the channel include a narrow stretch of vegetation along the shoreline and the shoreline habitats of three small islands south of I-10. The vegetation on the islands mainly consists of shrubs and small trees.

2.5.2 Conceptual Site Model

A conceptual site model is a written description and a visual representation of the predicted relationship between a stressor and a potential receptor that describes the potential sources, release mechanisms, transport pathways, and environmental exposure media of chemicals to receptors. The conceptual site model provides a

framework that facilitates application of the risk assessment process to the conditions and use of a site. Separate conceptual site models have been developed for the area north of I-10 and aquatic environment, and the area south of I-10.

North of I-10 and Aquatic Environment Conceptual Site Model

The conceptual site model for the area north of I-10 and aquatic environment is shown in Figure 5. Figure 6 identifies the potential routes of human exposure in detail and indicates whether they are considered significant or minor. For this area, hypothetical recreational and subsistence fishers, recreational visitors, and trespassers were identified as groups that may have contact with impacted media under baseline conditions.

Fishing activity within the waters surrounding the site has been observed and fishers in this area have been reported to collect whatever they catch. However, little information is available about the type and amount of fishing that occurs. Fishers may potentially be exposed to chemicals of potential concern (COPCs) via direct contact with sediments and soils, and by ingesting fish or shellfish that have been exposed to impacted media. They may also potentially be exposed to COPCs through direct contact with surface water (ingestion and dermal contact) or porewater (dermal contact), and through inhalation of COPCs as particulates or vapors in air; however, exposures via these media and routes are considered to be minor (Figure 6).

Although the lands at and near the site are largely privately owned, points of access were available to the public along and within this area under baseline conditions. Such access allowed for a variety of recreational activities other than fishing, including picnicking, walking, bird watching, wading, and boating. Shoreline use and wading at the site has been reported prior to construction of the temporary cap; recreational visitors could have potentially been exposed via the same direct contact exposure routes as fishers (i.e., incidental ingestion of and dermal contact with soils and sediments). However, these individuals are not exposed via ingestion of fish or shellfish.

Signs of trespassing have been reported in some areas at the site, particularly under the I-10 Bridge. The hypothetical trespasser is the receptor used to represent a very low level of possible exposure. Therefore, although a hypothetical trespasser could be exposed via the same pathways as the recreational visitor (i.e., direct contact pathways) and recreational fisher (i.e., ingestion of fish and shellfish), the concept of the trespasser is that of a person whose exposure would likely be intermittent and of a shorter term than the exposures being evaluated for either of those scenarios. Thus, for the area north of I-10, the estimated risks and hazards presented for the hypothetical fishers and hypothetical recreational visitors are higher than and would overstate potential risks for hypothetical trespassers. Therefore, the hypothetical trespasser scenario was not evaluated quantitatively for the area north of I-10 and aquatic environment.

South of I-10 Conceptual Site Model

The conceptual site model for the area of investigation on the peninsula south of I-10 is shown in Figure 7. Figure 8 describes the specific routes of potential exposure in detail. For this area, trespassers, commercial workers, and construction workers were identified as groups that may potentially come into contact with impacted media.

With signs of trespassing in areas along the western bank of the river at this site, it is possible that trespassers might walk around or spend time in the area of investigation on the peninsula south of I-10. Because such activities might result in direct contact with surface soil, potentially complete exposure pathways for the trespasser are incidental ingestion and dermal contact with soil. Because fencing and active management and use of industrial properties south of I-10 make this area largely inaccessible, it is anticipated that the trespasser's exposure would be infrequent. Also it is likely that trespassing activities by any given individual would be limited to a relatively short time frame (i.e., no more than a few years).

Land use on the peninsula south of I-10 is commercial/industrial. Commercial workers, who perform maintenance or other work-related outdoor activities, might have potential direct contact with surface and shallow subsurface soil. Potentially complete exposure pathways for the commercial worker are incidental ingestion and dermal contact with surface and shallow subsurface soil.

In the future, construction work could occur in the area of investigation on the peninsula south of I-10. Under this future scenario, construction workers may have direct contact with surface and subsurface soil. Potentially complete exposure pathways for the construction worker are incidental ingestion and dermal contact with surface and subsurface soils.

2.5.3 Nature and Extent of Contamination

The RI Report (Integral and Anchor 2013a) contains an in-depth discussion of the process involved to identify COCs and the nature and extent of contamination (RI Report, Section 5.2 for the area north of I-10 and Section 6.2 for the area south of I-10). Results of the baseline human health risk assessment (BHHRA) and baseline ecological risk assessment (BERA), indicate COCs include dioxins and furans, and PCBs (discussed in Section 2.7 of this ROD). This section discusses the nature and extent focusing on these COCs. Information is from the RI report (Integral and Anchor 2013a), unless otherwise noted.

Move details below to investigation section- not in enforcement section

Between April 2010 and July 2012, site-specific data were collected for the RI. The RI included the collection of sediment, tissue, soil, and groundwater samples. Physical data were collected and solid-phase micro extraction (SPME) porewater samplers were also evaluated as part of the RI.

Three hundred and fifty seven sediment samples were collected during the RI to evaluate the nature and extent of contamination, exposure, and determine an appropriate background tissue location. Sediment samples were collected from 0 to 6 inches, 6 to 12 inches, or in 1-foot intervals at depths ranging from 3 to 10 feet. Sediment samples were analyzed for a combination of the following analyses: dioxins and furans, PCBs, metals, SVOCs, volatile organic compounds (VOC), grain size, and total organic carbon (TOC).

One hundred eighty three tissue samples were collected during the RI to provide sufficient data to complete the baseline human health and ecological risk assessments and to evaluate biota-sediment relationships. Skin off fillets were collected from 50 hardhead catfish. The remainders of 18 hardhead catfish fillets from the fillet samples were also collected for analysis. Eighteen whole-body Gulf killifish were collected. The edible tissue from 35 common rangia clam was collected. The edible tissue from 50 blue crabs was collected. The remainders of crab after edible tissue was removed was analyzed for 12 blue crab samples. These tissue and remainder samples were analyzed for dioxins and furans and a subset were analyzed for PCBs, metals, and SVOCs.

Three hundred ninety two soil samples were collected during the RI to evaluate the nature and extent of contamination, exposure, fate and transport, and document right-of-way conditions. Soil samples were analyzed for a combination of the following analyses: dioxins and furans, PCBs, metals, SVOCs, VOCs, grain size, and TOC. An even smaller subset of samples were analyzed for pesticides, PCBs as Aroclors, and asbestos.

Ten monitoring wells were installed during the RI: three well pairs located on the berms of the northern impoundments, one well within the wastes of the western cell of the northern impoundment, and three monitoring wells in the area of investigation south of I-10. Groundwater samples were collected from the monitoring wells and analyzed for dioxins and furans, PCBs, metals, SVOCs, and total suspended solids to evaluate the nature and extent of contamination and the fate and transport of contaminants.

Physical data collected during the RI included: a bathymetric survey, current velocity (included surface water elevation and salinity), material, geotechnical, and riverbed properties, sediment loaded, erosion rates of cohesive sediment, and net sedimentation rates (through profiling vertical distribution of radioisotopes) (Integral and Anchor 2013a).

In addition to requirements of the *Operations, Monitoring, and Maintenance Plan* (Anchor 2011), discussed in Section 2.2.5, a porewater assessment was performed to evaluate the effectiveness of the TCRA armored cap. Porewater SPME samplers were deployed and retrieved. The sampling objective was to collect data on dioxins and furans in porewater in order to determine if vertical gradients in concentrations of dioxins and furans in cap porewater exists and to determine if porewater concentrations in the cap differ from concentrations in surface water above the cap.

The results of the RI are documented in other sections of this ROD, where relevant.

North of I-10 Soil TEQ

The following discussion describes the spatial extent of dioxin and furan concentrations in soils north of I-10, including the samples collected underneath I-10 in the Texas Department of Transportation (TxDOT) Right-of-Way.

The highest averages of dioxin and furan concentrations in surface soils north of I-10 occur in Soil Investigation Area 3 (Figure 9 and Table 1), which encompasses the northern impoundments. In Soil Investigation Area 3, the maximum TEQ concentration in surface soils (11,200 ng/kg) occurs in the southern portion of the western cell of the impoundments. Within Soil Investigation Area 3, the congener with the highest average concentration was 2,3,7,8-tetrachlorodibenzofuran (TCDF), at 6,680 ng/kg (Table 1). Average and maximum TEQ concentrations in surface soils in Soil Investigation Areas 1 and 2 are much lower than those within the Soil Investigation Area 3 (the northern impoundments).

In subsurface soils north of I-10, the highest average concentration of dioxins and furans also occurs in Soil Investigation Area 3 (Table 2). In Soil Investigation Area 3, the highest TEQ value in subsurface soils (16,200 ng/kg) occurs in the southern portion of the western cell (Figure 9). Consistent with surface soils within Soil Investigation Area 3, the highest average concentration for an individual congener was for 2,3,7,8-TCDF at 17,000 ng/kg (Table 2).

As with the surface soils, subsurface soil TEQ concentrations in Soil Investigation Areas 1 and 2 are lower than those within Area 3 the northern impoundments. The maximum TEQ concentration in subsurface soils of Soil Investigation Area 1 was 195 ng/kg and occurs in the 12- to 24-inch interval, in the northeastern corner of the upland sand separation area.

North of I-10 Soil PCBs

Outside of the 1966 impoundment perimeter and within soils north of I-10, Aroclors were detected in five samples from Soil Investigation Area 2, and were estimated in four of those. Aroclor 1254 was detected in soil from Station TxDOT002 at 130 µg/kg. Aroclors were not detected in surface and shallow subsurface soils of the upland sand separation area.

Because Aroclors were generally not detected in soils of Soil Investigation Area 1 and were rarely detected in Area 2 soils, only the dioxin-like PCB congener data (as TEQ_{P,M}) are used in figures, tables, and text supporting descriptions of the nature and extent of PCBs in soils. The data for dioxin-like PCB congeners provide a description over the widest possible geographical area. Aroclors 1242, 1248, 1254, and 1260 have at least one dioxin-like PCB present at greater than 0.5 percent (Frame et al. 1996); the dioxin-like congeners are therefore a reasonable surrogate for the presence of these Aroclors.

Two of the TxDOT stations in Soil Investigation Area 2 fall within the original 1966 perimeter of the impoundments north of I-10. The sample from one of these (TxDOT005) has the highest TEQ_{P,M} of all 14 soil samples (2.83 ng/kg; Figure 10), but this location does not correspond with the highest station having the highest TEQ in soils, which is at TxDOT004 (Figure 9), where the TEQ_{P,M} was just 0.93 ng/kg. The second highest TEQ_{P,M} concentration (2.23 ng/kg) was found at the location in Soil Investigation Area 2 furthest west of the northern impoundments, Station TxDOT007. There is no evident spatial pattern in the data for TEQ_{P,M} in soils that would suggest that the impoundments north of I-10 are an important source of dioxin-like PCBs in soils. The result for Station TxDOT007 suggests that the distribution of these dioxin-like PCBs in soils north of I-10 and in the TxDOT ROW is random, and likely reflects background conditions. There are no site-specific background data for PCB congeners.

North of I-10 Groundwater TEQ

In five of the seven monitoring wells installed north of I-10, no dioxin and furan congeners were detected. These five wells include two of the shallow wells in GWBU-A (the alluvial groundwater) and all three deep wells in GWBU-B (the unit below the Beaumont clay). One dioxin and one furan congener were detected in a well screened in GWBU-A (SJMWS02) at estimated concentrations of 3.6 picograms per liter (pg/L) (octachlorinated dibenzo-p-dioxin [OCDD]) and 1.89 pg/L (2,3,7,8-TCDF).

In the perched groundwater sample within the waste in the northern impoundments, SJMWS04, all but 4 of the 17 dioxin and furan congeners were detected or estimated at concentrations ranging from 14 pg/L to 9,100 pg/L (Table 3). This well was screened within the upper 2.5 feet of waste material in the impoundment. 2,3,7,8-TCDD was detected at a concentration of 2,700 pg/L. This is the only detection (estimated or otherwise) of 2,3,7,8-TCDD in any well north of I-10.

North of I-10 Groundwater PCBs

PCBs were analyzed as Aroclors only in the groundwater samples from locations within the 1966 perimeter of the impoundments north of I-10. Aroclors were not detected in any groundwater samples (Table 3). Matrix interferences in sample SJMWS04 likely resulted in elevated detection limits for Aroclors (Table 3).

Sediment TEQ

The spatial distribution of TEQ in surface and subsurface sediments is shown in Figures 11 and 12. Summary statistics for results of TEQ as well as the individual dioxin and furan congeners on a dry-weight basis for surface and subsurface sediments are provided in Tables 4 and 5.

In the baseline dataset, the spatial extent of dioxins and furans in sediment is well-defined. Dioxin and furan concentrations in sediments, expressed as TEQ results, are higher within the 1966 perimeter of the impoundments north of I-10 than elsewhere at the site. Within the 1966 perimeter of the impoundments north of I-10, TEQ results in sediments are highest in the western cell. TEQ results in sediment outside of the

northern impoundments are typically 3 to 4 orders of magnitude lower than those within the impoundments, even in areas directly adjacent to the 1966 impoundment perimeter.

The highest TEQ result (31,600 ng/kg) in surface sediment samples occurs in the uppermost 2-foot interval of the core the boring located in the north-central portion of the northern impoundments (Figure 11); cores surrounding it to the north, east, and southeast show much lower concentrations at all intervals, even within the 1966 impoundment perimeter. Cores within the western cell tend to show higher TEQ results throughout the upper core increments. TEQ results generally decrease from their maximum with depth within a given core indicating that the peak concentrations have been located in the vertical dimension.

TEQ results in surface sediment samples from two locations adjacent to the upland sand separation area are above 100 ng/kg, at estimated concentrations of 121 ng/kg (Station SJNE041) and 153 ng/kg (Station SJNE032). All other TEQ results in surface sediment outside of the 1966 impoundment perimeter are generally much lower. Grab samples with TEQ results that are not below 100 ng/kg include four locations around the southern end of the peninsula south of I-10, and a few surface samples near the original 1966 impoundment perimeter. In the vicinity of the upland sand separation area (Station SJNE032), two deep subsurface intervals (4 to 5 feet and 7 to 8 feet below mudline) have TEQ levels of 349 and 339 ng/kg, respectively, the highest TEQ measured outside the 1966 northern impoundment perimeter.

Sediment PCBs

The distribution of TEQ_{P,M} concentrations in surface and subsurface sediments is shown in Figures 13 and 14, respectively. Summary statistics for PCBs in surface sediments are listed in Table 6, and for subsurface sediments in Table 7. PCB congener detection frequency ranges from 0 for PCB congener 169 in subsurface sediments to 87 percent for PCB congener 105 in surface sediments. In surface samples, PCB congeners 105, 118, and 156/157 have a greater than 80 percent detection frequency, while PCB congeners 81, 126, and 169 were detected in less than 20 percent of the samples.

TEQ_{P,M} concentrations are highest in samples collected from within the 1966 perimeter of the impoundments north of I-10, with the maximum value of 38.1 ng/kg from the 4- to 6-foot depth interval in core SJGB012 (Figure 14). The TEQ_{P,M} concentrations in most surface and subsurface samples within the northern impoundment exceed 1 ng/kg, while all but two values outside of the northern impoundment are below 1 ng/kg. The exceptions are one surface and one subsurface sample location along the northwest portion of the peninsula south of I-10. These are in the surface interval at Station SJSD004 (6.85 ng/kg), and in the 12- to 24-inch depth interval of SJSD002 (1.58 ng/kg).

Data for PCB congeners in subsurface samples outside of the northern impoundments are not available, so concentrations of TEQ_{P,M} adjacent to the upland sand separation area, north of the northern impoundments, and elsewhere are not described.

Tissue TEQ

Tissue samples were collected from three site fish collection areas (FCAs) presented on Figure 15:

- FCA 1 – Downstream of I-10 (identified as SJFCA1 on Figure 15)
- FCA 2 – In the area surrounding the impoundments north of I-10 and the upland sand separation area (identified as SJFCA2 on Figure 15)
- FCA 3 – Upstream of the northern impoundments and upland separation area (identified as SJFCA3 on Figure 15).

Dioxins and furans were generally detected in tissue samples collected at the site and from background locations. In some samples, many congeners were never detected. Data for blue crab, hardhead catfish, clams, and Gulf killifish are summarized in this section.

Mean TEQ results in edible blue crab tissue range from 0.146 ng/kg at FCA 3 to 0.739 ng/kg in FCA 1 (Table 8). Means for edible crab tissue in FCA 2 and FCA 3 at 0.23 and 0.146 ng/kg, respectively, are closer to the background mean (0.157 ng/kg) than to the mean in FCA 1. In all FCAs, 2,3,7,8-TCDF has the highest mean and the highest individual concentrations among the dioxin and furan congeners in crab tissue.

Mean TEQ results in hardhead catfish fillet range from 2.94 in FCA 1 to 3.87 ng/kg in FCA 2 with the highest mean and the highest maximum in FCA 2 (Table 9). The overall range of TEQ concentrations in catfish fillet from FCAs 1 through 3 is 0.801 ng/kg in FCA 1 to 5.85 ng/kg in FCA 2, with the three maximum values for the three FCAs being fairly similar.

Edible clam (common rangia) tissues had the highest mean and maximum TEQ results within the site perimeter, with both the highest mean and the highest maximum in FCA 2. The mean TEQ in clams in FCA 2 is 7.89 ng/kg, where the maximum TEQ is 27 ng/kg, nearly as high as the maxima for whole catfish in FCA 1 and FCA 2. In addition, all but three dioxin and furan congeners were detected at least once in FCA 2; in all other areas (including background), the same four congeners were detected in clams: 2,3,7,8-TCDD, 1,2,3,4,6,7,8- heptachlorodibenzo-p-dioxin (HpCDD), 2,3,7,8-TCDF, and OCDD (Table 10). Other congeners were never detected in clams from FCA 1 and FCA 3 nor in clams from upstream.

Dioxins and furans were never detected in killifish samples from FCA 1, and only two dioxin congeners (1,2,3,4,6,7,8-HpCDD and OCDD) and one furan congener (2,3,7,8-TCDF) were detected in killifish from FCA 3 (Table 11). A total of seven dioxin and furan congeners (2,3,7,8-TCDD, 1,2,3,4,6,7,8-HpCDD, OCDD, 2,3,7,8-TCDF, 2,3,4,7,8-pentachlorodibenzo-furan, 1,2,3,4,7,8-hexachlorodibenzofuran [HxCDF], and 1,2,3,6,7,8-HxCDF) were detected in killifish from FCA 2. The maximum TEQ concentration in killifish (10.1 ng/kg) was in killifish from FCA 2.

Tissue PCBs

As described above, tissue samples were collected from three site FCAs (Figure 15). PCBs were detected in all edible and whole crab samples, including those from background. Like dioxins and furans, total PCB concentrations (as the sum of all congeners with nondetects set to one-half the detection limit) are higher in whole crab than in edible crab (Table 8). Among edible crab samples, background minimum, maximum, and mean total PCB concentrations are 0.55 µg/kg, 2.1 µg/kg, and 1.29 µg/kg, respectively. At the site, mean total PCB concentrations in edible crab tissue range from 2.0 µg/kg in FCA 1 to 7.4 µg/kg in FCA 2. Similarly, the highest mean TEQ_{P,M} occurs in FCA 2, where the overall maximum TEQ_{P,M} also occurs. The spatial pattern of PCBs in crab is therefore different from that of dioxins and furans as TEQ for which the highest concentrations in crab tissue are in FCA 1.

PCBs were detected in all catfish samples (Table 9). Total PCB concentrations are higher in whole catfish tissue samples than in catfish fillet, both from at the site and in Cedar Bayou. Total PCBs in Cedar Bayou catfish fillet samples range from 25.5 to 88.4 µg/kg, with a mean total PCB concentration of 46.5 µg/kg. At the site, the mean total PCB concentrations in catfish fillet ranges from 97.7 µg/kg in FCA 1 to 107 µg/kg in FCA 3. The smallest range in total PCB concentrations in catfish fillet occurs in FCA 2, which has the highest minimum among the FCAs. Mean and median total PCB concentrations in catfish tissue samples from all three FCAs are greater than those in catfish collected from the Cedar Bayou background sampling area.

In contrast to TEQ in catfish fillet tissue, the highest maximum and mean concentrations for TEQ_{P,M} are in fish from FCA 3 at 2.79 ng/kg and 1.36 ng/kg, respectively. Patterns are similar for whole catfish, except the highest maximum is in FCA 3 while the highest mean is in FCA 1. In whole catfish from all three FCAs, differences in the TEQ_{P,M} concentrations at the site relative to those from Cedar Bayou are much smaller than the differences between these two locations for TEQ.

PCBs were detected in all edible clam tissue samples, including background (Table 10). At the site, mean total PCB concentrations ranges from 23.6 µg/kg in FCA 1 to 46.1 µg/kg in FCA 2. The range is 20.2 µg/kg in FCA 2 to 95.4 µg/kg in FCA 2. Background minimum, maximum, and mean total PCB concentrations are 9.54 µg/kg, 17.8 µg/kg, and 12.9 µg/kg, respectively.

Concentrations of TEQ_{P,M} are generally lower in clams than those of TEQ. The mean TEQ_{P,M} is higher in FCA 2 (0.502 ng/kg) than its mean in FCA 1 (0.22 ng/kg) or FCA 3 (0.366 ng/kg). The same pattern holds for maximum values within the three FCAs (Table 10). Clams from FCA 1 have the lowest maximum (0.271 ng/kg) and the lowest median (0.225 ng/kg) TEQ_{P,M} concentrations. In comparison, the minimum, maximum, and mean upstream background TEQ_{P,M} concentrations are 0.118 ng/kg, 0.283 ng/kg, and 0.181 ng/kg, respectively. Concentrations of TEQ_{P,M} in clams (and killifish) are not significantly different in FCA 1 than in the upstream background area.

PCBs were detected in all Gulf killifish tissue samples, including in upstream background samples (Table 11). At the site, mean total PCB concentrations range from 36.2 µg/kg in FCA 1 to 82.6 µg/kg in FCA 2. The maximum TEQ_{P,M} concentration in

killifish (2.92 ng/kg) is also for FCA 2. Background minimum, maximum, and mean total PCB concentrations are 10.2 µg/kg, 14.6 µg/kg, and 12 µg/kg, respectively. Mean total PCB concentrations detected Gulf killifish tissue samples at the site are significantly greater than in background Gulf killifish tissue, but TEQ_{P,M} is not significantly different in FCA 1 or FCA 3 than in background.

South of I-10 Soil

TEQ concentrations in surface soil from Soil Investigation Area 4 and adjacent sampled areas range from 1.35 to 36.9 ng/kg (Table 12). TEQ concentrations above 30 ng/kg in surface soil occur at both the southern (Stations SJSB023 and SJSB024) and northern (Stations SJSB001 and SJSB014) ends of Soil Investigation Area 4 (Figure 16). These are the only locations where TEQ in surface soils exceeds the surface soil reference envelope value for this parameter of 24.3 ng/kg. Substantially lower concentrations including the minimum TEQ concentration of 1.35 ng/kg are found at stations in close proximity to those that exceed the surface soil reference envelope value, indicating that these few slightly elevated TEQ concentrations are localized. The average surface soil TEQ in Soil Investigation Area 4 and adjacent areas is most similar to that of Soil Investigation Area 2, beneath I-10, in the TxDOT Right-of-Way (Table 1). Within Soil Investigation Area 4, the congener with the highest concentration in surface soil is OCDD, at 64,900 ng/kg (Table 12). TCDD concentrations range up to 24.3 ng/kg.

In subsurface soils from 6 to 24 inches, TEQ results range from 0.134 to 303 ng/kg, with an average of 16.5 ng/kg (Figure 16). The second highest result in this depth interval (43.1 ng/kg at Station SJSB018) is much lower than the maximum (Figure 16). The average TEQ result in subsurface soils from 6 to 24 inches deep is slightly greater in the area of investigation on the peninsula south of I-10 than in Soil Investigation Area 1, which includes the upland sand separation area and the nearby access road north of I-10 (Table 2). As for surface soils, the congener with the highest results in subsurface soils collected south of I-10 is OCDD at 106,000 ng/kg (Table 13).

TEQ results deeper than 2 feet range from 0.092 to 50,100 ng/kg and average 743 ng/kg (Table 14). The maximum core TEQ occurs at a depth of 6 to 8 feet and is at Station SJSB019 in the southern part of soil investigation area 4 (Figure 16). Station SJSB023 has the second-highest TEQ concentration (35,500 ng/kg, at depth interval of 4 to 6 feet [Figure 16]); the highest concentration in surface soils is also found at this location. The majority of the highest core TEQ concentrations occur between 6 and 12 feet deep, and are associated with stations located near the center of the peninsula south of I-10.

South of I-10 Groundwater

Three or more dioxin and furan congeners were detected in all three monitoring wells south of I-10. For those that were detected, the highest concentrations consistently occur in SJMW001. The TEQ result in SJMW001 of 47.3 pg/L. The average concentration of 2,3,7,8-TCDD in all wells is 17.1 pg/L (using the estimated result in

SJMW002 of 8.92 pg/L and the detection limit in SJMW003 of 9.9 pg/L). Table 15 presents summary statistics for groundwater samples collected south of I-10.

2.5.4 Chemical Fate and Transport

Section 5.6 of the RI Report contains a summary of the chemical fate and transport processes affecting the concentrations of dioxins and furans at the site. The most significant points of this discussion are summarized in the FS (EPA 2016) and are provided below:

- Sediment-water interactions – Dioxins and furans are hydrophobic and preferentially bind to particulate matter. Particulate-associated dioxins and furans within the sediment bed enter the water column through sediment deposition and erosion processes. Deposition of sediments with low concentrations of chemicals may support natural recovery.
- Partitioning and dissolved phase flux – Because dioxins and furans are hydrophobic, they will be present primarily in particulate form, and their fate is therefore determined largely by sediment transport processes. Dioxins and furans within the sediment matrix include dissolved-phase dioxins and furans in porewater through partitioning processes, which can result in a transfer of dissolved-phase mass to the water column under certain conditions.
- Transport in the water column – Dioxins and furans present in the water column in any phase are transported by surface water currents, which are affected by hydrodynamic processes within the larger San Jacinto River.
- External sources – Publicly owned treatment plant outfalls, other point-source discharges, stormwater runoff, and atmospheric deposition are all sources of dioxins and furans. As documented in the RI Report, groundwater is not a source of dioxins or furans to the San Jacinto River.

It should also be noted that data analyses and literature review, including evaluation of region-specific multivariate datasets, indicates that the majority of dioxin and furan congeners do not consistently bioaccumulate in fish or invertebrate tissue. This is due to biological controls on uptake and excretion in both fish and invertebrates (Integral 2010). As a result, systematic predictions of bioaccumulation from concentrations of dioxins and furans in abiotic media (both sediment and water) are only possible for tetrachlorinated congeners. However, even these correlations are weak, and are associated with high uncertainty (Integral 2010).

2.6 CURRENT AND POTENTIAL FUTURE LAND AND RESOURCE USES

This section summarizes the current and reasonably anticipated future land and resource use at the site and surrounding the site. This information forms the basis for the exposure assessment assumptions and risk characterization conclusions discussed in Section 2.7.

2.6.1 Land Use

Current land use at the site is primarily industrial and commercial use, as presented on Figure 17. Current land use surrounding the site includes mixed residential and industrial uses to the west, and undeveloped or residential areas to the east and north. Immediately south of the site is commercial/industrial land use. Moving farther from the site, the amount of residential land use increases, along with other land use categories not found in the immediate vicinity, such as undeveloped land, farms, parks, and lands listed as “other” (e.g., schools and hospitals). The future land use is not anticipated to be different from the current land use.

2.6.2 Surface Water Use

The San Jacinto River watershed encompasses nearly 4,000 square miles and approximately 310 miles of open streams including primary streams and tributary channels. The San Jacinto River flows from its headwaters near Huntsville, Texas through Lake Conroe and Lake Houston. The Port of Houston Authority operates the Houston Ship Channel, which originates at the Turning Basin on Buffalo Bayou and follows to the San Jacinto River. The Houston Ship Channel continues through the San Jacinto River and San Jacinto Bay to Galveston Bay.

The area south of the site is dominated by activities associated with the Houston Ship Channel, specifically industrial sites that are served by the barges and ocean-going vessels that use the Houston Ship Channel. From the site north to Lake Houston, there is less industrialization along the river.

Harvesting Shellfish and Fish

Commercial and recreational fishing activity occurs throughout Galveston Bay. The San Jacinto River along with nearby Upper Galveston Bay, Tabbs Bay, and the San Jacinto State Park have “many points of public access and support both recreational and subsistence fishing activities” (Texas Department of State Health Services [TDSHS] 2005). Near the site, fishing is known to occur, however the amount and frequency of fishing has not been determined (Integral and Anchor 2013a). No known subsistence fishing communities have been documented in the area.

Consumption of mollusks and shellfish (clams, mussels, and oysters) taken from public fresh waters is prohibited by TDSHS. Within public salt waters, these shellfish may be taken only from waters approved by TDSHS. TDSHS shellfish harvest maps designate approved or conditionally approved harvest areas. Waters near the site are not included on these maps (TPWD 2009).

Other Recreational Use

Although the site is private land, access points along the San Jacinto River allow for a variety of recreational activities including picnicking, swimming, nature walks, bird watching, wading, fishing, boating, water sports, and other shoreline uses. In the area to the south of the I-10 Bridge on the west side of the river, children and adults have

been reported to at times play along the shoreline, wade in the water, and fish (Integral and Anchor 2013a).

Potable Surface Water Use

There are no surface water intakes within 15 miles downstream of the northern impoundments or of the peninsula south of I-10 (TCEQ 2006).

2.7 SUMMARY OF SITE RISKS

The primary hazardous substances present at the Site are dioxins and furans. Dioxins are the by-products of various industrial processes (i.e., bleaching paper pulp, and chemical and pesticide manufacture) and combustion activities (i.e., burning household trash, forest fires, and waste incineration).

After being absorbed, dioxin distributes to organs according to lipid (fat) content and readily accumulates in body fat. The half-life of TCDD in the human body ranges from 7 to 12 years. The most common health effect in people exposed to large amounts of dioxins, in particular 2,3,7,8-tetrachloro dibenzo-p-dioxin (TCDD), is chloracne. Chloracne cases have typically been the result of accidents or significant contamination events. Chloracne is a severe skin disease with acne-like lesions that occur mainly on the face and upper body. Other skin effects noted in people exposed to high doses of TCDD include skin rashes, discoloration, and excessive body hair. Changes in blood and urine that may indicate liver damage also are seen in people. Exposure to high concentrations of dioxins may induce long-term alterations in glucose metabolism and subtle changes in hormone levels.

TCDD carcinogenicity in animals is well established. All cancer bioassays have been positive. They show that dioxin is a complete carcinogen that does not require another chemical exposure for full action. TCDD appears to be a potent tumor promoter. However, the specific carcinogenic mechanism for TCDD has not been fully elucidated. TCDD produces cancer at all sites in animals. Epidemiological data support that TCDD increases cancer incidence in all sites for humans. World Health Organization (WHO), National Institute for Occupational Safety and Health (NIOSH), and the EPA concluded that dioxin increases the risk for all cancers. Dioxin also increases the risk for several individual cancers, including soft-tissue malignant tumor (sarcoma), lung cancer, cancer of the lymphatic tissue (non-Hodgkin's lymphoma), and malignant enlargement of the lymph nodes, spleen, and liver (Hodgkin's disease).

In addition to chloracne, dioxins can cause several health effects, including transient mild liver damage (hepatotoxicity) and peripheral nerve damage (neuropathy). The suspected health effects of dioxins include respiratory cancers, prostate cancer, multiple myeloma (malignant tumor of the bone marrow), porphyria cutanea tarda (liver dysfunction and photosensitive skin lesions), Type 2 diabetes, neurobehavioral development effects in infants, and men in highly exposed populations are less likely to father boys.

The U.S. Department of Health and Human Services has determined that TCDD may reasonably be anticipated to cause cancer and the World Health Organization has determined that TCDD is a

human carcinogen. The EPA has classified hexachloro dibenzo-p-dioxin as a probable human carcinogen (B2).

BHHRA and BERA were conducted to determine potential pathways by which people (human receptors) or animals (ecological receptors) could be exposed to upland or aquatic contamination in sediment, soil, water, or biota, the amount of contamination receptors of concern may be exposed to, and the toxicity of those contaminants if no action were taken to address contamination at the site (Integral 2012, Integral 2013). These assessments provide the basis for taking action and identify the contaminants and exposure pathways that need to be addressed by the remedial action. Section 2.7.1 provides a summary of the relevant portions of the BHHRA as summarized from Integral and Anchor (2013b). Section 2.7.2 provides a summary of the relevant portions of the BERA as summarized from Integral (2013). Section 2.7.3 discusses the basis for action at the site.

2.7.1 Summary of Human Health Risk Assessment

The baseline risk assessment estimates what risks the site poses if no action were taken. It provides the basis for taking action and identifies the contaminants and exposure pathways that need to be addressed by the remedial action. This section of the ROD summarizes the results of the BHHRA.

Identification of Chemicals of Concern

The tables below present the COCs and exposure point concentrations for each of the COCs detected in media (i.e., the concentration that will be used to estimate the exposure and risk from each COC). The tables include the number of samples per exposure unit, as well as the frequency of detection (i.e., the number of times the chemical was detected in the samples collected at the site), the exposure point concentration, and how the exposure point concentration was derived.

**Chemicals of Concern and Baseline Exposure Point Concentrations
North of I-10 and Aquatic Environment**

Scenario Timeframe: Baseline						
Exposure Unit	Chemical of Concern	Number of Samples	Maximum Result (ng/kg)	Frequency of Detection (percent)	Exposure Point Concentration (ng/kg)	Statistical Measure
Sediment						
Beach Area A	TEQ(ND=1/2)	5	0.495	100	0.456	95UCL
	TEQ(ND=0)	5	0.373	100	0.339	95UCL
	Aroclors(ND=1/2)	Not Sampled	--	--	--	--
	Aroclors(ND=0)	Not Sampled	--	--	--	--
	TEQ _p (ND=1/2)	Not Sampled	--	--	--	--
Beach Area B/C	TEQ _p (ND=0)	Not Sampled	--	--	--	--
	TEQ(ND=1/2)	10	10.9	100	6.36	95UCL
	TEQ(ND=0)	10	10.7	100	6.12	95UCL
	Aroclors(ND=1/2)	Not Sampled	--	--	--	--
	Aroclors(ND=0)	Not Sampled	--	--	--	--
Beach Area D	TEQ _p (ND=1/2)	Not Sampled	--	--	--	--
	TEQ _p (ND=0)	Not Sampled	--	--	--	--
	TEQ(ND=1/2)	7	2.9	100	2.12	95UCL
	TEQ(ND=0)	7	2.8	100	2.0	95UCL
	Aroclors(ND=1/2)	Not Sampled	--	--	--	--
Aroclors(ND=0)	Not Sampled	--	--	--	--	

	TEQ _P (ND=1/2)	Not Sampled	--	--	--	--
	TEQ _P (ND=0)	Not Sampled	--	--	--	--
Beach Area E	TEQ(ND=1/2)	17	47,000	100	13,000	95UCL
	TEQ(ND=0)	17	46,000	100	13,000	95UCL
	Aroclors(ND=1/2)	4	1,400,000	0	1,400,000	Max A 1254
	Aroclors(ND=0)	4	0	0	0	Max
	TEQ _P (ND=1/2)	4	4.5	100	4.5	Max
	TEQ _P (ND=0)	4	2.43	100	2.35	95UCL
Tissue – Hardhead Catfish Fillet						
FCA 1	TEQ(ND=1/2)	10	5.45	100	3.92	95UCL
	TEQ(ND=0)	10	5.32	100	3.86	95UCL
	PCB _C (ND=1/2)	12	156,000	100	104,000	95UCL
	PCB _C (ND=0)	12	156,000	100	104,000	95UCL
	TEQ _P (ND=1/2)	12	2.27	100	1.67	95UCL
	TEQ _P (ND=0)	12	2.17	100	1.43	95UCL
FCA 2/3	TEQ(ND=1/2)	20	5.85	100	4.06	95UCL
	TEQ(ND=0)	20	5.84	100	3.99	95UCL
	PCB _C (ND=1/2)	20	129,000	100	94,200	95UCL
	PCB _C (ND=0)	20	129,000	100	94,200	95UCL
	TEQ _P (ND=1/2)	20	2.79	100	1.57	95UCL
	TEQ _P (ND=0)	20	2.7	100	2.38	95UCL

**Chemicals of Concern and Baseline Exposure Point Concentrations
North of I-10 and Aquatic Environment (Continued)**

Scenario Timeframe: Baseline						
Exposure Unit	Chemical of Concern	Number of Samples	Maximum Result (ng/kg)	Frequency of Detection (percent)	Exposure Point Concentration (ng/kg)	Statistical Measure
Tissue – Edible Clam						
FCA 1/3	TEQ(ND=1/2)	10	2.19	100	1.65	95UCL
	TEQ(ND=0)	10	2.12	100	1.51	95UCL
	PCB _C (ND=1/2)	10	26,900	100	21,700	95UCL
	PCB _C (ND=0)	10	26,900	100	21,600	95UCL
	TEQ _P (ND=1/2)	10	0.436	100	0.346	95UCL
	TEQ _P (ND=0)	10	0.104	100	0.0802	95UCL
FCA 2	TEQ(ND=1/2)	15	27	100	19	95UCL
	TEQ(ND=0)	15	26.9	100	21.4	95UCL
	PCB _C (ND=1/2)	15	61,800	100	50,000	95UCL
	PCB _C (ND=0)	15	61,800	100	50,000	95UCL
	TEQ _P (ND=1/2)	15	1.9	100	0.824	95UCL
	TEQ _P (ND=0)	15	0.787	100	0.442	95UCL
Tissue – Edible Crab						
FCA 1	TEQ(ND=1/2)	10	1.91	100	1.07	95UCL
	TEQ(ND=0)	10	1.85	100	0.972	95UCL
	PCB _C (ND=1/2)	10	4,820	100	3,350	95UCL
	PCB _C (ND=0)	10	4,740	100	3,290	95UCL
	TEQ _P (ND=1/2)	10	0.234	100	0.148	95UCL
	TEQ _P (ND=0)	10	0.0271	100	0.0201	95UCL
FCA 2/3	TEQ(ND=1/2)	20	0.558	60	0.286	95UCL
	TEQ(ND=0)	20	0.523	60	0.176	95UCL
	PCB _C (ND=1/2)	20	11,400	100	7,170	95UCL
	PCB _C (ND=0)	20	11,300	100	7,130	95UCL
	TEQ _P (ND=1/2)	20	0.547	100	0.296	95UCL
	TEQ _P (ND=0)	20	0.525	100	0.186	95UCL
Soil						
North of I-10	TEQ(ND=1/2)	46	153	100	22.6	95UCL
	TEQ(ND=0)	46	152	100	23.8	95UCL
	Aroclors(ND=1/2)	15	130,000	26.7	48,400	95UCL
	Aroclors(ND=0)	15	130,000	26.7	48,400	95UCL
	TEQ _P (ND=1/2)	12	2.83	91.7	2.65	95UCL
	TEQ _P (ND=0)	12	2.83	91.7	2.83	Max

Note:

95UCL – 95 percent upper confidence limit

FCA – fish collection area

Max – maximum result

Max A 1254 – maximum result of Aroclor 1254

ND=0 – nondetect results assumed equal to zero in TEQ calculation

ND=1/2 – nondetect results assumed equal to 1/2 the detection limit in TEQ calculation

ng/kg – nanograms per kilogram

PCB_c – sum of 43 PCB congeners

TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient

TEQ_p – toxicity equivalent for dioxin-like polychlorinated biphenyls

Chemicals of Concern and Baseline Exposure Point Concentrations South of I-10

Scenario Timeframe: Baseline						
Exposure Unit	Chemical of Concern	Number of Samples	Maximum Result (ng/kg)	Frequency of Detection (percent)	Exposure Point Concentration (ng/kg)	Statistical Measure
Surface Soil						
0-6 Inches	TEQ(ND=1/2)	26	36.9	100	27.9	95UCL
	TEQ(ND=0)	26	36.9	100	28.2	95UCL
Surface and Shallow Subsurface Soil						
0-12 Inches	TEQ(ND=1/2)	26	36.9	100	24.6	95UCL
	TEQ(ND=0)	26	36.9	100	24.7	95UCL
Surface and Deep Subsurface Soils (0-10 Feet)						
DS-1	TEQ(ND=1/2)	--	--	--	2,400	--
	TEQ(ND=0)	--	--	--	2,400	--
DS-2	TEQ(ND=1/2)	--	--	--	10,900	--
	TEQ(ND=0)	--	--	--	10,900	--
DS-3	TEQ(ND=1/2)	--	--	--	5.94	--
	TEQ(ND=0)	--	--	--	5.71	--
DS-4	TEQ(ND=1/2)	--	--	--	7,770	--
	TEQ(ND=0)	--	--	--	7,770	--
DS-5	TEQ(ND=1/2)	--	--	--	552	--
	TEQ(ND=0)	--	--	--	552	--
Note: -- - information unavailable 95UCL – 95 percent upper confidence limit ND=0 – nondetect results assumed equal to zero in TEQ calculation ND=1/2 – nondetect results assumed equal to ½ the detection limit in TEQ calculation ng/kg – nanograms per kilogram TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient						

Exposure Assessment

Exposure pathways quantitatively evaluated in the BHHRA for the area north of I-10 and aquatic environment included the following:

- Recreational Fisher – direct contact (incidental ingestion and dermal contact) with sediment and soils, ingestion of finfish, and ingestion of shellfish
- Subsistence Fisher – direct contact (incidental ingestion and dermal contact) with sediment and soils, ingestion of finfish, and ingestion of shellfish
- Recreational Visitor – direct contact (incidental ingestion and dermal contact) with sediment and soils.

Exposure pathways for the area north of I-10 and aquatic environment are presented in the conceptual site model (Figure 5) and discussed in Section 5.1.1 of the BHHRA. Both recreational and subsistence fishers are assumed to ingest fish and/or shellfish caught at the site. Recreational fishers are assumed to ingest 25 percent of total fish or shellfish intake that is site-related (Table 16). Subsistence fishers are assumed to ingest 100 percent of total fish or shellfish intake that is site-related (Table 16). In the absence of detailed information regarding fishing activities and consumption patterns in the area, exposures were estimated using three scenarios: 1) ingestion of finfish only, 2) ingestion of clams only, and 3) ingestion of crabs only. Assuming a single-tissue type exposure is a conservative approach because it identifies and quantifies potential exposure to the tissue type that may result in the highest potential for exposure (Integral

and Anchor 2013b). Cumulative exposures (i.e., ingestion and dermal contact) were summed for each tissue ingestion scenario separately by exposure area. Baseline sediment, tissue, and soil exposure areas are presented on Figures 18 through 20, respectively. Table 17 provides a complete set of hypothetical exposure scenarios evaluated for the baseline condition. As a part of the BHHRA, the potential for adverse health effects to hypothetical receptors under conditions following the TCRA (termed as the post-TCRA condition) were also evaluated for dioxins and furans. As discussed in Section 2.2.5, TCRA construction was completed in 2011 and included installation of an armored cap, fencing, and warning signs over and around the northern impoundments. Post-TCRA sediment and soil exposure areas are presented on Figures 21 and 22. Post-TCRA risks and hazards were only evaluated for dioxins and furans for scenarios and receptors that have baseline conditions with a cumulative estimated exposure that resulted in:

- An incremental cancer risk greater than one in 10,000
- A total endpoint-specific noncancer hazard index (HI) greater than 1
- A dioxin cancer HI greater than 1.

Table 16 provides exposure parameter assumptions used for the area north of I-10 and the aquatic environment.

Exposure pathways quantitatively evaluated in the BHHRA for the area south of I-10 included the following:

- Trespasser – direct contact (incidental ingestion and dermal contact) with surface soil
- Commercial Worker – direct contact (incidental ingestion and dermal contact) with surface and shallow subsurface soil
- Future Construction Worker – direct contact (incidental ingestion and dermal contact) with surface and subsurface soil.

Exposure pathways for the area south of I-10 are presented in the conceptual site model (Figure 7) and discussed in Section 6.1.1 of the BHHRA (Integral and Anchor 2013b). Exposure to future construction workers was evaluated using five 0.5-acre exposure units. Table 18 provides exposure parameter assumptions used for the area south of I-10.

The potential inhalation of dioxins and furans in air and exposure via direct contact with surface water were identified as minor exposure pathways and only addressed qualitatively. Inhalation exposure via vapor is considered minor because dioxins and furans are not volatile compounds and therefore would not tend to volatilize into air. Inhalation of particulates derived from the resuspension of surface soil may occur; however this pathway generally contributes less than one percent of total estimated exposure when direct soil contact pathways (ingestion and dermal contact) are considered. Exposure to dioxins and furans in surface water is also considered to be a

minor pathway because they are hydrophobic (not soluble in water), and tend to be bound to organic carbon in sediment. It is possible suspended sediment particles in the water column could come in contact with human receptors; however, those exposures are assumed to be brief and minimal because the movement of surface water would likely wash away the majority of sediment particles that contact the skin.

Toxicity Assessment

The tables below provide the carcinogenic and noncarcinogenic risk information relevant to COCs in sediment, soil, and tissue that was used in the BHHRA (Integral and Anchor 2013b).

Cancer Toxicity Data

Chemical of Concern	Provisional Tolerable Oral Daily Intake / Oral Cancer Slope Factor	Units	Weight of Evidence/Cancer Guideline Description	Date of Most Recent Update
TEQ ¹	2.3	pg/kg-day	B2- probable human carcinogen, sufficient evidence in animals and inadequate or no evidence in humans	2002
Polychlorinated Biphenyls ²	2.0	mg/kg-day	B2- probable human carcinogen, sufficient evidence in animals and inadequate or no evidence in humans	1997

Note:
¹ 2,3,7,8-TCDD values were used to evaluate TEQ. It is based on the Joint Food and Agriculture Organization/World Health Organization Expert Committee on Food Additives (2002) recommended provisional tolerable monthly intake for all potential health effects including cancer, adjusted to reflect a daily intake as discussed in the BHHRA (Integral and Anchor 2013b).
² Information presented was used in the reasonable maximum exposure calculations of the BHHRA, different values were used for central tendency exposure.
 BHHRA – baseline human health risk assessment
 mg/kg – milligrams per kilogram
 pg/kg – picograms per kilogram
 TCDD – tetrachlorodibenzo-p-dioxin
 TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient

Noncancer Toxicity Data

Chemical of Concern	Chronic			Subchronic			Primary Target Organ	Date of Most Recent Update
	Oral RfD Value (pg/kg-day)	Source	Combined Uncertainty/Modifying Factors	Oral RfD Value (pg/kg-day)	Source	Combined Uncertainty/Modifying Factors		
TEQ ¹	0.7	IRIS	30	0.7	IRIS ²	30	Reproductive/Developmental Issues	2/17/2012
Polychlorinated Biphenyls ³	20,000	IRIS	300	60,000	calculated ⁴	100	Immune System	11/1/1996

Note:
¹ 2,3,7,8-TCDD values were used to evaluate TEQ.
² no subchronic RfD was available, the chronic RfD was selected.
³ Values for Aroclor 1254 presented. Aroclor 1254 was the only Aroclor detected at the site.
⁴ Derivation of the chronic RfD included a factor adjust for less than lifetime exposure. This value was removed to derive the subchronic exposure.
 IRIS – Integrated Risk Information System
 pg/kg – picograms per kilogram
 RfD – reference dose
 TCDD – tetrachlorodibenzo-p-dioxin
 TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient

Risk Characterization

For carcinogens, risks are generally expressed as the incremental probability of an individual's developing cancer over a lifetime as a result of exposure to the carcinogen. Excess lifetime cancer risk is calculated from the following equation:

$$\text{Risk} = \text{CDI} \times \text{SF}$$

where

risk = a unitless probability (e.g., 2×10^{-5}) of an individual's developing cancer as a result of site-related exposure

CDI = chronic daily intake averaged over 70 years (picograms per kilogram [pg/kg]-day)

SF = slope factor, expressed as $(\text{pg/kg-day})^{-1}$.

These risks are probabilities that usually are expressed in scientific notation (e.g., 1×10^{-6}). An excess lifetime cancer risk of 1×10^{-6} indicates that an individual experiencing the reasonable maximum exposure estimate has a 1 in 1,000,000 chance of developing cancer as a result of site-related exposure. This is referred to as an "excess lifetime cancer risk" because it would be in addition to the risks of cancer individuals face from other causes such as smoking or exposure to too much sun. The chance of an individual's developing cancer from other causes has been estimated to be as high as one in three. EPA's generally acceptable risk range for site-related exposures is 10^{-4} to 10^{-6} .

The potential for noncarcinogenic effects is evaluated by comparing an exposure level over a specified time period (e.g., life-time) with a reference dose (RfD) derived for a similar exposure period. An RfD represents a level that an individual may be exposed to that is not expected to cause any deleterious effect. The ratio of exposure to toxicity is called a hazard quotient (HQ). An $\text{HQ} < 1$ indicates that a receptor's dose of a single contaminant is less than the RfD, and that toxic noncarcinogenic effects from that chemical are unlikely. The HI is generated by adding the HQs for all COCs that affect the same target organ (e.g., liver) or that act through the same mechanism of action within a medium or across all media to which a given individual may reasonably be exposed. An $\text{HI} < 1$ indicates that, based on the sum of all HQs from different contaminants and exposure routes, toxic noncarcinogenic effects from contaminants are unlikely. An $\text{HI} > 1$ indicates that site-related exposures may present a risk to human health.

The HQ is calculated as follows:

$$\text{Non-cancer HQ} = \text{CDI/RfD}$$

where

CDI = chronic daily intake

RfD = reference dose.

CDI and RfD are expressed in the same units and represent the same exposure period (i.e., chronic, subchronic, or short-term).

For some carcinogens (e.g., dioxins and furans), a threshold or minimum dose must be reached before a carcinogenic effect can occur. For these carcinogens, the potential for cancer to occur as a result of the assumed exposure is estimated using a hazard metric like that described for noncancer hazards above (Integral and Anchor 2013b). The BHHRA (Integral and Anchor 2013b) evaluated both cancer risks and cancer hazards for dioxins and furans. Additional discussion of this topic can be found in the *Toxicological and Epidemiological Studies Memorandum* (Integral 2012; Appendix B of the BHHRA).

The text and tables below provide a summary of site related noncancer HIs above 1 and cancer HIs above 1. There were no cancer risks above 1×10^{-4} identified in the BHHRA (Integral and Anchor 2013b). HIs presented below are based on calculations of reasonable maximum exposure. Reasonable maximum exposure is defined as the highest exposure that could be reasonably anticipated to occur for a given exposure pathway and scenario at the site. Central tendency exposure, or the average estimate of exposure, was also evaluated in the BHHRA (Integral and Anchor 2013b); however it will not be included here for brevity.

The deterministic risk assessment for a recreational fisher north of I-10 and the aquatic environment is presented in Section 5.2.2.1 of the BHHRA (Integral and Anchor 2013b) and is summarized below. For a recreational fisher in Exposure Scenarios 3A, 3B, and 3C (direct exposure to Beach Area E and the ingestion of catfish, clam, or crab from the fishing areas identified), the reproductive/developmental noncancer HIs are greater than one and indicate a potential for adverse noncancer effects. The table below provides noncancer HQs for exposure to sediment and fish or shellfish for all scenarios with endpoint-specific HIs greater than one for recreational fisher exposure scenarios.

North of I-10 and the Aquatic Environment Noncancer Hazards for a Recreational Fisher

Scenario Timeframe:	Baseline				
Receptor Population:	Recreational Fisher				
Receptor Age:	Young Child				
Calculation Assumption:	Reasonable Maximum Exposure				
Chemical¹	Primary Target Organ	Noncancer Hazard Quotient			Exposure Route Total³
		Incidental Ingestion of Sediment	Dermal Contact with Sediment	Consumption of Fish or Shellfish²	
Scenario 1A: Direct Exposure Beach Area A; Ingestion of Catfish from FCA 2/3					
TEQ	Reproductive/Developmental	0.00023	0.0013	1.1	1.1
Methylmercury ⁴	Reproductive/Developmental	--	--	0.27	0.27
Reproductive/Developmental Endpoint-Specific Hazard Index					1.4
Scenario 2A: Direct Exposure Beach Area B/C; Ingestion of Catfish from FCA 2/3					
TEQ	Reproductive/Developmental	0.0032	0.018	1.1	1.1
Methylmercury ⁴	Reproductive/Developmental	--	--	0.27	0.27
Reproductive/Developmental Endpoint-Specific Hazard Index					1.4
Scenario 3A: Direct Exposure Beach Area E; Ingestion of Catfish from FCA 2/3					
TEQ	Reproductive/Developmental	6.5	37	1.1	45
Methylmercury ⁴	Reproductive/Developmental	--	--	0.27	0.27
Reproductive/Developmental Endpoint-Specific Hazard Index					45
PCBs	Immune	0.049	0.65	0.88	1.6
Inorganic Mercury ⁴	Immune	0.0047	0.013	--	0.02
Immune Endpoint-Specific Hazard Index					1.6
Scenario 3B: Direct Exposure Beach Area E; Ingestion of Clam from FCA 2					
TEQ	Reproductive/Developmental	6.5	37	0.21	44
Methylmercury ⁴	Reproductive/Developmental	--	--	0.0009	0.0009
Reproductive/Developmental Endpoint-Specific Hazard Index					44
Scenario 3C: Direct Exposure Beach Area E; Ingestion of Crab from FCA 2/3					
TEQ	Reproductive/Developmental	6.5	37	0.0032	44
Methylmercury ⁴	Reproductive/Developmental	--	--	0.003	0.003
Reproductive/Developmental Endpoint-Specific Hazard Index					44
Scenario 4A: Direct Exposure Beach Area D; Ingestion of Catfish from FCA 1					
TEQ	Reproductive/Developmental	0.0011	0.006	1.0	1.0
Methylmercury ⁴	Reproductive/Developmental	--	--	0.36	0.36
Reproductive/Developmental Endpoint-Specific Hazard Index					1.4
Note:					
¹ All chemicals with primary target organ exposure route totals greater than 1 are included in this table.					
² See scenario title for identification of tissue consumed					
³ Two significant figures presented, differences between values presented in the risk assessment tables and those presented here are either a result of the number of significant figures presented, rounding, or both.					
⁴ Consistent with EPA guidance (2010c), 100 percent of mercury detected in tissue was assumed to be methylmercury and 100 percent of mercury detected in soil and sediment was assumed to be inorganic mercury.					
FCA – fish collection area					
PCB – polychlorinated biphenyls					
TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient					

The deterministic risk assessment for a recreational fisher north of I-10 and the aquatic environment is presented in Section 5.2.2.1 of the BHHRA (Integral and Anchor 2013b) and is summarized below. For a recreational fisher in Exposure Scenarios 3A, 3B, and 3C (direct exposure to Beach Area E and the ingestion catfish, clam, or crab from the fishing areas identified), the TEQ cancer HIs are greater than one and indicate a potential for cancer. The table below provides TEQ cancer HIs for recreational fisher exposure scenarios that are greater than one.

North of I-10 and the Aquatic Environment Cancer Hazards for a Recreational Fisher

Scenario Timeframe:	Baseline			
Receptor Population:	Recreational Fisher			
Receptor Age:	Lifetime			
Calculation Assumption:	Reasonable Maximum Exposure			
Chemical of Concern	TEQ Cancer Hazard Quotient¹			Total³
	Incidental Ingestion of Sediment	Dermal Contact with Sediment	Consumption of Fish or Shellfish²	
Scenario 3A: Direct Exposure Beach Area E; Ingestion of Catfish from FCA 2/3				
TEQ	2.0	11	0.33	14
Scenario 3B: Direct Exposure Beach Area E; Ingestion of Clam from FCA 2				
TEQ	2.0	11	0.065	13
Scenario 3C: Direct Exposure Beach Area E; Ingestion of Crab from FCA 2/3				
TEQ	2.0	11	0.00098	13
<p>Note:</p> <p>¹ A threshold or minimum dose must be reached for TEQ before a carcinogenic effect can occur. Therefore, the potential for cancer to occur as a result of the assumed exposure is estimated using a hazard metric like that described for noncancer hazards. For additional discussion regarding this topic see Integral and Anchor 2013b.</p> <p>² See scenario title for identification of tissue consumed</p> <p>³ Two significant figures presented, differences between values presented in the risk assessment tables and those presented here are either a result of the number of significant figures presented, rounding, or both.</p> <p>FCA – fish collection area</p> <p>TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient</p>				

The deterministic risk assessment for a subsistence fisher north of I-10 and the aquatic environment is presented in Section 5.2.2.2 of the BHHRA (Integral and Anchor 2013b) and is summarized below. For a subsistence fisher exposure to any of the beaches and the ingestion catfish, clam, or crab from the fishing areas identified have reproductive/developmental noncancer HIs are greater than one and indicate a potential for adverse noncancer effects. The table below provides noncancer HQs for exposure to sediment and fish or shellfish for all scenarios with endpoint-specific HIs greater than one for subsistence fisher exposure scenarios.

North of I-10 and the Aquatic Environment Noncancer Hazards for a Subsistence Fisher

Scenario Timeframe:	Baseline				
Receptor Population:	Subsistence Fisher				
Receptor Age:	Young Child				
Calculation Assumption:	Reasonable Maximum Exposure				
Chemical¹	Primary Target Organ	Noncancer Hazard Quotient			Exposure Route Total³
		Incidental Ingestion of Sediment	Dermal Contact with Sediment	Consumption of Fish or Shellfish²	
Scenario 1A: Direct Exposure Beach Area A; Ingestion of Catfish from FCA 2/3					
TEQ	Reproductive/Developmental	0.00061	0.0035	9.2	9.2
Methylmercury ⁴	Reproductive/Developmental	--	--	2.3	2.3
Reproductive/Developmental Endpoint-Specific Hazard Index					12
PCBs	Immune	--	--	7.4	7.4
Inorganic Mercury ⁴	Immune	0.000065	0.00018	--	0.00025
Immune Endpoint-Specific Hazard Index					7.4
Scenario 2A: Direct Exposure Beach Area B/C; Ingestion of Catfish from FCA 2/3					
TEQ	Reproductive/Developmental	0.0085	0.048	9.2	9.2
Methylmercury ⁴	Reproductive/Developmental	--	--	2.3	2.3
Reproductive/Developmental Endpoint-Specific Hazard Index					12
PCBs	Immune	--	--	7.4	7.4
Inorganic Mercury ⁴	Immune	0.00012	0.00035	--	0.00047
Immune Endpoint-Specific Hazard Index					7.4

**North of I-10 and the Aquatic Environment Noncancer Hazards for a Subsistence Fisher
(Continued)**

Scenario Timeframe:	Baseline				
Receptor Population:	Subsistence Fisher				
Receptor Age:	Young Child				
Calculation Assumption:	Reasonable Maximum Exposure				
Chemical ¹	Primary Target Organ	Noncancer Hazard Quotient			Exposure Route Total ³
		Incidental Ingestion of Sediment	Dermal Contact with Sediment	Consumption of Fish or Shellfish ²	
Scenario 2B: Direct Exposure Beach Area B/C; Ingestion of Clam from FCA 2					
TEQ	Reproductive/Developmental	0.0085	0.048	2.9	2.9
Methylmercury ⁴	Reproductive/Developmental	--	--	0.012	0.012
Reproductive/Developmental Endpoint-Specific Hazard Index					2.9
Scenario 3A: Direct Exposure Beach Area E; Ingestion of Catfish from FCA 2/3					
TEQ	Reproductive/Developmental	17	99	9.2	130
Methylmercury ⁴	Reproductive/Developmental	--	--	2.3	2.3
Reproductive/Developmental Endpoint-Specific Hazard Index					130
PCBs	Immune	0.13	1.7	7.4	9.2
Inorganic Mercury ⁴	Immune	0.012	0.035	--	0.047
Immune Endpoint-Specific Hazard Index					9.3
Scenario 3B: Direct Exposure Beach Area E; Ingestion of Clam from FCA 2					
TEQ	Reproductive/Developmental	17	99	2.9	120
Methylmercury ⁴	Reproductive/Developmental	--	--	0.012	0.012
Reproductive/Developmental Endpoint-Specific Hazard Index					120
PCBs	Immune	0.13	1.7	0.26	2.1
Inorganic Mercury ⁴	Immune	0.12	0.035	--	0.16
Immune Endpoint-Specific Hazard Index					2.3
Scenario 3C: Direct Exposure Beach Area E; Ingestion of Crab from FCA 2/3					
TEQ	Reproductive/Developmental	17	99	0.043	120
Methylmercury ⁴	Reproductive/Developmental	--	--	0.04	0.04
Reproductive/Developmental Endpoint-Specific Hazard Index					120
PCBs	Immune	0.13	1.7	0.038	1.9
Inorganic Mercury ⁴	Immune	0.012	0.035	--	0.047
Immune Endpoint-Specific Hazard Index					2.0
Scenario 4A: Direct Exposure Beach Area D; Ingestion of Catfish from FCA 1					
TEQ	Reproductive/Developmental	0.0028	0.016	8.8	8.9
Methylmercury ⁴	Reproductive/Developmental	--	--	3.0	3.0
Reproductive/Developmental Endpoint-Specific Hazard Index					12
PCBs	Immune	--	--	8.2	8.2
Inorganic Mercury ⁴	Immune	0.00025	0.00071	--	0.00096
Immune Endpoint-Specific Hazard Index					8.2
Note:					
¹ All chemicals with primary target organ exposure route totals greater than 1 are included in this table.					
² See scenario title for identification of tissue consumed					
³ Two significant figures presented, differences between values presented in the risk assessment tables and those presented here are either a result of the number of significant figures presented, rounding, or both.					
⁴ Consistent with EPA guidance (2010c), 100 percent of mercury detected in tissue was assumed to be methylmercury and 100 percent of mercury detected in soil and sediment was assumed to be inorganic mercury.					
FCA – fish collection area					
PCB – polychlorinated biphenyls					
TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient					

The deterministic risk assessment for a subsistence fisher north of I-10 and the aquatic environment is presented in Section 5.2.2.2 of the BHHRA (Integral and Anchor 2013b) and is summarized below. For a subsistence fisher in Exposure Scenarios 1A, 2A, 3A, 3B, 3C, and 4A (direct exposure to Beach Areas A, B/C, E, and D and the ingestion of catfish, clam, or crab from the fishing areas identified), the TEQ cancer HIs are greater

than one and indicate a potential for cancer. The table below provides TEQ cancer HIs for subsistence fisher exposure scenarios that are greater than one.

North of I-10 and the Aquatic Environment Cancer Hazards for a Subsistence Fisher

Scenario Timeframe:	Baseline			
Receptor Population:	Subsistence Fisher			
Receptor Age:	Lifetime			
Calculation Assumption:	Reasonable Maximum Exposure			
Chemical of Concern	TEQ Cancer Hazard Quotient¹			Total³
	Incidental Ingestion of Sediment	Dermal Contact with Sediment	Consumption of Fish or Shellfish²	
Scenario 1A: Direct Exposure Beach Area A; Ingestion of Catfish from FCA 2/3				
TEQ	0.00019	0.0011	2.8	2.8
Scenario 2A: Direct Exposure Beach Area B/C; Ingestion of Catfish from FCA 2/3				
TEQ	0.0026	0.015	2.8	2.8
Scenario 3A: Direct Exposure Beach Area E; Ingestion of Catfish from FCA 2/3				
TEQ	5.3	30	2.8	38
Scenario 3B: Direct Exposure Beach Area E; Ingestion of Clam from FCA 2				
TEQ	5.3	30	0.87	36
Scenario 3C: Direct Exposure Beach Area E; Ingestion of Crab from FCA 2/3				
TEQ	5.3	30	0.013	35
Scenario 4A: Direct Exposure Beach Area D; Ingestion of Catfish from FCA 1				
TEQ	0.00086	0.0049	2.7	2.7
Note:				
¹ A threshold or minimum dose must be reached for TEQ before a carcinogenic effect can occur. Therefore, the potential for cancer to occur as a result of the assumed exposure is estimated using a hazard metric like that described for noncancer hazards. For additional discussion regarding this topic see Integral and Anchor 2013b.				
² See scenario title for identification of tissue consumed				
³ Two significant figures presented, differences between values presented in the risk assessment tables and those presented here are either a result of the number of significant figures presented, rounding, or both.				
FCA – fish collection area				
TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient				

The deterministic risk assessment for a recreational visitor north of I-10 and the aquatic environment is presented in Section 5.2.2.3 of the BHHRA (Integral and Anchor 2013b) and is summarized below. For a recreational visitor in Exposure Scenario 3 (direct exposure to Beach Area E), the reproductive/developmental noncancer HI is greater than one and indicates there is a potential for adverse noncancer effects. The table below provides noncancer HQs for exposure to sediment and soil for all scenarios with endpoint-specific HIs greater than one for recreational fisher exposure scenarios.

North of I-10 and the Aquatic Environment Noncancer Hazards for a Recreational Visitor

Scenario Timeframe:	Baseline					
Receptor Population:	Recreational Visitor					
Receptor Age:	Young Child					
Calculation Assumption:	Reasonable Maximum Exposure					
Chemical¹	Primary Target Organ	Noncancer Hazard Quotient				Total²
		Incidental Ingestion of Sediment	Incidental Ingestion of Soil	Dermal Contact with Sediment	Dermal Contact with Soil	
Scenario 3: Direct Exposure Beach Area E						
TEQ	Reproductive/Developmental	8.7	0.015	49	0.0021	58
Reproductive/Developmental Endpoint-Specific Hazard Index						58
Note:						
¹ All chemicals with primary target organ exposure route totals greater than 1 are included in this table.						
² Two significant figures presented, differences between values presented in the risk assessment tables and those presented here are either a result of the number of significant figures presented, rounding, or both.						
TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient						

The deterministic risk assessment for a recreational visitor north of I-10 and the aquatic environment is presented in Section 5.2.2.3 of the BHHRA (Integral and Anchor 2013b) and is summarized below. For a recreational visitor in Exposure Scenario 3 (direct exposure to Beach Area E), the TEQ cancer HI is greater than one and indicates a potential for cancer. The table below provides the TEQ cancer HI for the recreational visitor exposure scenario that is greater than one.

North of I-10 and the Aquatic Environment Cancer Hazards for a Recreational Visitor

Scenario Timeframe:	Baseline					
Receptor Population:	Recreational Visitor					
Receptor Age:	Lifetime					
Calculation Assumption:	Reasonable Maximum Exposure					
Chemical of Concern	Incidental Ingestion of Sediment	TEQ Cancer Hazard Quotient¹			Total²	
		Incidental Ingestion of Soil	Dermal Contact with Sediment	Dermal Contact with Soil		
Scenario 3: Direct Exposure Beach Area E						
TEQ	2.6	0.0046	15	0.00065	18	
Note:						
¹ A threshold or minimum dose must be reached for TEQ before a carcinogenic effect can occur. Therefore, the potential for cancer to occur as a result of the assumed exposure is estimated using a hazard metric like that described for noncancer hazards. For additional discussion regarding this topic see Integral and Anchor 2013b.						
² Two significant figures presented, differences between values presented in the risk assessment tables and those presented here are either a result of the number of significant figures presented, rounding, or both.						
TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient						

Following completion of the deterministic risk assessment, results of which are presented above, refinement analyses were completed if north of I-10 and the aquatic environment exposure scenarios met one or both of the following thresholds:

- An incremental cancer risk greater than one in 10,000 (no scenarios met this)
- A total endpoint-specific noncancer HI greater than 1
- A dioxin cancer HI greater than 1.

Refinement analyses are discussed in Section 5.2.3 of the BHHRA (Integral and Anchor 2013b) and included: 1) an analysis and comparison of background hazards with

estimated deterministic hazards for the area, 2) an evaluation of post-TCRA condition hazards, and 3) a probabilistic risk assessment of potential hazards.

The background hazard evaluation is presented in Section 5.2.3.1 of the BHHRA (Integral and Anchor 2013b), the results of which are summarized below. The tables below provide summaries of noncancer and TEQ cancer HIs for recreational fisher, subsistence fisher, and recreational visitor exposure scenarios, respectively. Evaluation of background hazards, performed in the BHHRA, indicated the following:

- **Sediment**
 - Exposure to beach area E resulted in hazards exceeding background
 - Exposure to other beach areas results in hazards consistent with background
- **Catfish**
 - Ingestion of site catfish results in hazards exceeding background
 - Background hazards contribute to total hazards (e.g., provide almost ½ the total hazards for PCBs and TEQ)
 - Hazards associated with mercury are likely due to background
- **Clams**
 - Ingestion of clams from FCA 2 results in hazards exceeding background
 - Ingestion of clams from FCA 1/3 results in hazards slightly higher than background.

Recreational Fisher Summary of Background Hazards

Scenario	Incidental Ingestion of Sediment	Dermal Contact with Sediment	Fish or Shellfish Ingestion	Hazard Index Total ¹
Noncancer Hazard Index				
A – Direct Exposure to Sediment; Ingestion of Catfish	0.002	0.01	1	1
B – Direct Exposure to Sediment; Ingestion of Clam	0.002	0.01	0.01	0.03
C – Direct Exposure to Sediment; Ingestion of Crab	0.002	0.01	0.01	0.03
TEQ Cancer Hazard Index				
A – Direct Exposure to Sediment; Ingestion of Catfish	0.00009	0.0005	0.1	0.1
B – Direct Exposure to Sediment; Ingestion of Clam	0.00009	0.0005	0.002	0.002
C – Direct Exposure to Sediment; Ingestion of Crab	0.00009	0.0005	0.0006	0.001
Note: ¹ Calculations based on reasonable maximum exposure. TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient				

Subsistence Fisher Summary of Background Hazards

Scenario	Incidental Ingestion of Sediment	Dermal Contact with Sediment	Fish or Shellfish Ingestion	Hazard Index Total ¹
Noncancer Hazard Index				
A – Direct Exposure to Sediment; Ingestion of Catfish	0.005	0.04	10	10
B – Direct Exposure to Sediment; Ingestion of Clam	0.005	0.04	0.2	0.2
C – Direct Exposure to Sediment; Ingestion of Crab	0.005	0.04	0.1	0.2
TEQ Cancer Hazard Index				
A – Direct Exposure to Sediment; Ingestion of Catfish	0.0002	0.001	1	1
B – Direct Exposure to Sediment; Ingestion of Clam	0.0002	0.001	0.02	0.02
C – Direct Exposure to Sediment; Ingestion of Crab	0.0002	0.001	0.008	0.01
Note: ¹ Calculations based on reasonable maximum exposure. TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient				

Recreational Visitor Summary of Background Hazards

Scenario	Incidental Ingestion of Sediment	Incidental Ingestion of Soil	Dermal Contact with Sediment	Dermal Contact with Soil	Hazard Index Total ¹
Noncancer Hazard Index					
Direct Exposure to Sediment and Soil	0.002	0.01	0.02	0.003	0.04
TEQ Cancer Hazard Index					
Direct Exposure to Sediment and Soil	0.0001	0.002	0.0007	0.0002	0.003
Note: ¹ Calculations based on reasonable maximum exposure. TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient					

The post-TCRA hazard evaluation is presented in Section 5.2.3.2 of the BHHRA (Integral and Anchor 2013b); the results of which are summarized below. Post-TCRA hazards were only evaluated for dioxins and furans and varies from the baseline in the following ways:

- Assumes limited individual direct contact exposure to large areas of the site based on installation of the armored cap, fencing, and signage
- Incorporates model-estimated reductions in concentrations of dioxins and furans in catfish tissue
- Excludes clam tissue from Transect 3 of the dataset.

Further discussion regarding the assumptions used in the post-TCRA condition evaluation are included in Appendix F of the BHHRA (Integral and Anchor 2013b). The tables below presents results of the post-TCRA evaluation, baseline condition, and background evaluation. TEQ noncancer and cancer HIs were lower in the post-TCRA condition than in the baseline condition. Only scenarios for subsistence fishers including ingestion of catfish have HIs above 1 in the post-TCRA condition.

Summary of Post-TCRA, Baseline, and Background TEQ Noncancer Hazards

Baseline Scenario	Post-TCRA Scenario	TEQ Noncancer Hazard Index ¹		
		Post-TCRA	Baseline	Background
Recreational Fisher (Direct Contact / Tissue Ingestion)				
3A – Beach E / Catfish FCA 2/3	Beach A / post TCRA Catfish FCA 2/3	0.7	0.4	0.4
3B – Beach E / Clam FCA 2	Beach A / post TCRA Clam FCA 2	0.04	0.4	0.007
3C – Beach E / Crab FCA 2/3	Beach A / Crab FCA 2/3	0.005	0.4	0.004
Subsistence Fisher (Direct Contact / Tissue Ingestion)				
1A – Beach A / Catfish FCA 2/3	Beach A / post TCRA Catfish FCA 2/3	6	9	4
2A – Beach B/C / Catfish FCA 2/3	Beach A / post TCRA Catfish FCA 2/3	6	9	4
3A – Beach E / Catfish FCA 2/3	Beach A / post TCRA Catfish FCA 2/3	6	100	4
4A – Beach D / Catfish FCA 1	None ²	--	--	--
2B – Beach B/C / Clam FCA 2	Beach A / post TCRA Clam FCA 2	0.5	3	0.08
3B – Beach E / Clam FCA 2	Beach A / post TCRA Clam FCA 2	0.5	3	0.08
3C – Beach E / Crab FCA 2/3	Beach A / Crab FCA 2/3	0.05	100	0.08
Recreational Visitor (Direct Contact)				
3 – Beach E and Soil North of I-10	Beach A and post-TCRA soils North of I-10	0.008	60	0.009
Note: ¹ Calculations based on reasonable maximum exposure. ² Only Beach A is accessible under post-TCRA conditions. Because FCA 1 is not adjacent to Beach A, this is not a possible post-TCRA condition. FCA – fish collection area TCRA – time critical removal action TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient				

Summary of Post-TCRA, Baseline, and Background TEQ Cancer Hazards

Baseline Scenario	Post-TCRA Scenario	TEQ Cancer Hazard Index ¹		
		Post-TCRA	Baseline	Background
Recreational Fisher (Direct Contact / Tissue Ingestion)				
3A – Beach E / Catfish FCA 2/3	Beach A / post TCRA Catfish FCA 2/3	0.2	10	0.1
3B – Beach E / Clam FCA 2	Beach A / post TCRA Clam FCA 2	0.01	10	0.002
3C – Beach E / Crab FCA 2/3	Beach A / Crab FCA 2/3	0.001	10	0.001
Subsistence Fisher (Direct Contact / Tissue Ingestion)				
1A – Beach A / Catfish FCA 2/3	Beach A / post TCRA Catfish FCA 2/3	2	3	1
2A – Beach B/C / Catfish FCA 2/3	Beach A / post TCRA Catfish FCA 2/3	2	3	1
3A – Beach E / Catfish FCA 2/3	Beach A / post TCRA Catfish FCA 2/3	2	40	1
4A – Beach D / Catfish FCA 1	None ²	--	--	--
2B – Beach B/C / Clam FCA 2	Beach A / post TCRA Clam FCA 2	0.1	0.9	0.02
3B – Beach E / Clam FCA 2	Beach A / post TCRA Clam FCA 2	0.1	0.9	0.02
3C – Beach E / Crab FCA 2/3	Beach A / Crab FCA 2/3	0.01	40	0.01
Recreational Visitor (Direct Contact)				
3 – Beach E and Soil North of I-10	Beach A and post-TCRA soils North of I-10	0.002	20	0.003
Note: ¹ Calculations based on reasonable maximum exposure. ² Only Beach A is accessible under post-TCRA conditions. Because FCA 1 is not adjacent to Beach A, this is not a possible post-TCRA condition. FCA – fish collection area TCRA – time critical removal action TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient				

The probabilistic risk assessment is presented in Section 5.2.3.3 of the BHHRA (Integral and Anchor 2013b); the results of which are summarized below. The probabilistic risk assessment modeled exposure for young child fishers and young child recreational visitors for exposure to TEQ in sediment, tissue, and soils, PCBs in all tissue types, and methylmercury in catfish. Appendix G of the BHHRA (Integral and Anchor 2013b) provides a complete presentation of the probabilistic risk assessment. The tables below present the deterministic and probabilistic results for noncancer and TEQ cancer hazards. The results provide insight into the variability of exposures and hazards that may occur. Variability in various factors that influence exposure has a large impact on estimated hazards. Because the reasonable maximum exposure for a young child did not account for these sources of variability, they likely overestimated hazards (Integral and Anchor 2013b).

Probabilistic Results for Noncancer Hazards, Area North of I-10 and Aquatic Environment

Scenario	Endpoint Category	Hazard Index			
		Deterministic Results ¹		Probabilistic Results	
		Recreational	Subsistence	90 th Percentile	95 th Percentile
BASELINE HAZARDS					
Fisher Scenarios (Direct Contact / Tissue Ingestion)					
1A – Beach A / Catfish FCA 2/3	Immunotoxicity	0.9	7	2	3
	Reproductive/Developmental	1	10	2	3
2A – Beach B/C / Catfish FCA 2/3	Immunotoxicity	0.9	7	2	3
	Reproductive/Developmental	1	10	2	3
3A – Beach E / Catfish FCA 2/3	Immunotoxicity	2	9	2	3
	Reproductive/Developmental	40	100	8	10
4A – Beach D / Catfish FCA 1	Immunotoxicity	1	8	2	3
	Reproductive/Developmental	1	10	2	4
2B – Beach B/C / Clam FCA 2	Immunotoxicity	0.02	0.3	0	0.07
	Reproductive/Developmental	0.2	3	0.03	0.3
3B – Beach E / Clam FCA 2	Immunotoxicity	0.7	2	0	0.07
	Reproductive/Developmental	40	100	6	10
3C – Beach E / Crab FCA 2/3	Immunotoxicity	0.7	2	0	0.01
	Reproductive/Developmental	40	100	6	10
Visitor Scenario (Direct Contact)					
3 – Beach E and Soil North of I-10	Reproductive/Developmental	60	--	2	4
BACKGROUND HAZARDS					
Fisher Scenarios (Direct Contact / Tissue Ingestion)					
A – Direct Exposure to Sediment; Ingestion of Catfish	Immunotoxicity	0.5	4	1	2
	Reproductive/Developmental	0.7	6	1	2
B – Direct Exposure to Sediment; Ingestion of Clam	Immunotoxicity	0.005	0.06	0	0.03
	Reproductive/Developmental	0.008	0.08	0.003	0.03
C – Direct Exposure to Sediment; Ingestion of Crab	Immunotoxicity	0.0004	0.006	0	0.003
	Reproductive/Developmental	0.006	0.06	0.003	0.02
Visitor Scenario (Direct Contact)					
Direct Exposure to Sediment and Soil	Reproductive/Developmental	0.009	--	0.0009	0.001
Note: ¹ Calculations based on reasonable maximum exposure. FCA – fish collection area TCRA – time critical removal action TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient					

Probabilistic Results for TEQ Cancer Hazards, Area North of I-10 and Aquatic Environment

Scenario	Hazard Index			
	Deterministic Results ¹		Probabilistic Results ²	
	Recreational	Subsistence	90 th Percentile	95 th Percentile
BASELINE HAZARDS				
Fisher Scenarios (Direct Contact / Tissue Ingestion)				
1A – Beach A / Catfish FCA 2/3	0.3	3	0.5	0.8
2A – Beach B/C / Catfish FCA 2/3	0.3	3	0.5	0.8
3A – Beach E / Catfish FCA 2/3	10	40	2	4
4A – Beach D / Catfish FCA 1	0.3	3	0.5	0.7
2B – Beach B/C / Clam FCA 2	0.07	0.9	0.01	0.1
3B – Beach E / Clam FCA 2	10	40	2	3
3C – Beach E / Crab FCA 2/3	10	40	2	3
Visitor Scenario (Direct Contact)				
3 – Beach E and Soil North of I-10	20	--	0.7	1
BACKGROUND HAZARDS				
Fisher Scenarios (Direct Contact / Tissue Ingestion)				
A – Direct Exposure to Sediment; Ingestion of Catfish	0.1	10	0.1	0.2
B – Direct Exposure to Sediment; Ingestion of Clam	0.002	0.02	0.0009	0.009
C – Direct Exposure to Sediment; Ingestion of Crab	0.001	0.02	0.0009	0.005
Visitor Scenario (Direct Contact)				
Direct Exposure to Sediment and Soil	0.003	--	0.0003	0.0004
Note:				
¹ Calculations based on reasonable maximum exposure.				
FCA – fish collection area				
TCRA – time critical removal action				
TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient				

The human health risk assessment summary and conclusions for the area south of I-10 is presented in Section 6.2.4 of the BHHRA (Integral and Anchor 2013b) and is summarized below. For the area south of I-10, the future construction worker TEQ noncancer and cancer HIs are greater than one for exposure areas DS-1, DS-2, and DS-4. The tables below provide endpoint-specific HIs and cumulative noncancer HIs for future construction worker exposure scenarios that have a noncancer HI greater than one and TEQ cancer HIs for future construction worker exposure scenarios that have a TEQ cancer HI greater than one.

South of I-10 Noncancer Hazards for a Future Construction Worker

Scenario Timeframe:	Baseline			
Receptor Population:	Construction Worker			
Receptor Age:	Adult			
Calculation Assumption:	Reasonable Maximum Exposure			
Chemical¹	Primary Target Organ	Noncancer Hazard Quotient		Total²
		Incidental Ingestion of Soil	Dermal Contact with Soil	
Scenario DS-1: Direct Exposure to Surface and Subsurface Soils				
TEQ	Reproductive/Developmental	4.8	0.49	5.3
Reproductive/Developmental Endpoint-Specific Hazard Index				5.3
Scenario DS-2: Direct Exposure to Surface and Subsurface Soils				
TEQ	Reproductive/Developmental	22	2.2	24
Reproductive/Developmental Endpoint-Specific Hazard Index				24
Scenario DS-4: Direct Exposure to Surface and Subsurface Soils				
TEQ	Reproductive/Developmental	16	1.6	17
Reproductive/Developmental Endpoint-Specific Hazard Index				17
Note:				
¹ All chemicals with primary target organ exposure route totals greater than 1 are included in this table.				
² Two significant figures presented, differences between values presented in the risk assessment tables and those presented here are either a result of the number of significant figures presented, rounding, or both.				
TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient				

South of I-10 Cancer Hazards for a Future Construction Worker

Scenario Timeframe:	Baseline		
Receptor Population:	Construction Worker		
Receptor Age:	Lifetime		
Calculation Assumption:	Reasonable Maximum Exposure		
Chemical of Concern	TEQ Cancer Hazard Quotient¹		Total²
	Incidental Ingestion of Soil	Dermal Contact with Soil	
Scenario DS-1: Direct Exposure to Surface and Subsurface Soils			
TEQ	1.5	0.15	1.6
Scenario DS-2: Direct Exposure to Surface and Subsurface Soils			
TEQ	6.7	0.67	7.4
Scenario DS-4: Direct Exposure to Surface and Subsurface Soils			
TEQ	4.8	0.48	5.3
Note:			
¹ A threshold or minimum dose must be reached for TEQ before a carcinogenic effect can occur. Therefore, the potential for cancer to occur as a result of the assumed exposure is estimated using a hazard metric like that described for noncancer hazards. For additional discussion regarding this topic see Integral and Anchor 2013b.			
² Two significant figures presented, differences between values presented in the risk assessment tables and those presented here are either a result of the number of significant figures presented, rounding, or both.			
TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient			

The BHHRA identifies the following as sources contributing to risk assessment uncertainty in Sections 5.2.4 and 6.2.3:

- Data collection, analysis, and treatment (e.g., elevated detection limits for PCBs as Aroclors, analysis of 43 PCB congeners rather than the complete set of 209)
- Calculation of dioxin and furan TEQs (e.g., use of ½ the detection limit for nondetect congeners)

- Exposure assessment assumptions (e.g., the lack of quantification of minor pathways, age assumptions, fish and shellfish consumption rates)
- Toxicity criteria (e.g., dioxins and furans, PCBs).

However, states that “the parameters used for evaluating potential exposures and estimating risks and hazards relied on multiple conservative assumptions, which enhance the likelihood that potential assumed exposures and estimated risks are overestimated” (Integral and Anchor 2013b).

2.7.2 Summary of Ecological Risk Assessment

A screening level ecological risk assessment (SLERA) for the site, not addressing the southern impoundment, was completed in 2010. The initial SLERA is included as Appendix B to the RI/FS Work Plan (Anchor and Integral 2010). Following completion of the SLERA, a BERA for the site, not addressing the southern impoundment, was completed (Integral 2013). A SLERA for the southern impoundment was completed concurrently with the site BERA and is included as Appendix E to the BERA (Integral 2013). A BERA for the southern impoundment was subsequently completed and is included as Appendix D to the RI Report (Integral and Anchor 2013a).

Identification of Chemicals of Potential Ecological Concern

The BERA for the area north of I-10 and aquatic environments identified chemicals of potential ecological concern (COPECs). Tables 19 and 20 present the COPEC screening. Chemicals in sediment with a detection frequency of at least 5 percent in the RI dataset that were either 1) present in at least one sample at a concentration greater than sediment screening concentrations protective of benthic invertebrate communities or 2) have no screening value protective of benthic invertebrate communities and were not correlated with dioxins and furans, are considered COPECs for benthic macroinvertebrate communities (Integral 2013). If a chemical was detected in greater than 5 percent of sediment samples in the RI dataset, and is thought to be bioaccumulative (TCEQ 2006), it was considered to be a COPEC was evaluated for fish and wildlife (Integral 2013).

Exposure Assessment

The site is located in a low gradient, tidal estuary near the confluence of the San Jacinto River and the Houston Ship Channel, as discussed above in Section 2.5 of this ROD. Habitats include upland, aquatic, and riparian.

There are no site-specific data describing wildlife uses of the upland portions of the site. Based on local wildlife lists and the types of habitat and land uses, it is reasonable to expect a suite of generalist terrestrial species that are not highly specialized in their habitat requirements and are adapted to moderate levels of disturbance. The reptiles and amphibians that could occur in the vicinity of the site include snakes, alligators, and turtles. Avian taxa using upland habitats may include sparrows and other generalist

passerines, starlings, pigeons and doves, corvids, and killdeer. Mammals expected in a semi-urban environment like the site include small mammals (rodents), skunks, raccoons, coyotes, and opossums. Upland habitats could support mammals, such as marsh rice rats and deer that could migrate to the islands close to mainland areas, as well as passerines that could use the vegetated uplands for nesting and foraging, and shoreline birds such as sandpipers and herons that could wade and forage in the shallow areas adjacent to the islands.

The tidal portions of the San Jacinto River and upper Galveston Bay provide rearing, spawning, and adult habitat for a variety of marine and estuarine fish and invertebrate species. Species known to occur in the vicinity of the site include clams and oysters, blue crab (*Callinectes sapidus*), black drum (*Paganius cromis*), southern flounder (*Paralichthys lethostigma*), hardhead (*Ariopsis afelis*), blue catfish (*Ictalurus furcatus*), spotted sea trout (*Cynoscion nebulosis*), and grass shrimp (*Palaemonetes pugio*) (Gardiner et al. 2008; Usenko et al. 2009).

Aquatic birds and semiaquatic mammals that are found in the vicinity of the site include ducks, shorebirds, wading birds (herons and egrets), diving piscivores, and various others. There are a number of migratory bird species known to winter in the vicinity of the site. They include belted kingfisher (*Megaceryle alcyon*), red breasted merganser (*Mergus serrator*), greater yellowlegs (*Tringa melanoleuca*), western sandpiper (*Calidris mauri*), and dabbling ducks including gadwall (*Anas strepera*) and teal. Herons and closely related birds that use wetland and estuarine habitats and that may be present in the site vicinity include the green (*Butorides virescens*), tri-colored (*Egretta tricolor*), and little blue (*E. cerulea*) herons, and also the black-crowned (*Nycticorax nycticorax*) and yellow-crowned (*N. violacea*) night-herons. Raptors, rails, pelicans, gulls, ducks, and sandpipers are also among the aquatic-dependent and aquatic-associated bird species that use the aquatic habitat that is present in the vicinity of the site. Sandpipers, egrets, and herons are wading birds that forage along shallow intertidal areas for benthic macroinvertebrates and small fish. Piscivorous bird species that may forage in the open waters of the river include cormorants, osprey, and pelicans. Omnivores including gulls and ducks may forage at the river's edge as well as in the water column. Mammals using both aquatic and wetland habitats that could occur in the vicinity of the site include the marsh rice rat, muskrats, nutria, and raccoon.

Endangered and Threatened Species

Wildlife that are state-listed as threatened and endangered and have the potential to be found in the general vicinity of the site are:

- Timber rattlesnake
- Smooth green snake
- Alligator snapping turtle
- White-faced ibis
- Brown pelican
- Rafinesque's big-eared bat.

In addition to these listed species, the American bald eagle, protected under the federal Bald and Golden Eagle Protection Act and listed as threatened by the State of Texas, may be found in the vicinity of the site.

Ecological Receptors and Receptor Surrogates

Ecological receptor surrogates were selected to be representative of the trophic and ecological relationships known or expected at the site. In selecting receptor surrogates, the following criteria were considered:

- The receptor is or could potentially be present at the site.
- The receptor is representative of one or more feeding guilds.
- The receptor is known to be either sensitive or potentially highly exposed to COPECs at the site.
- Life history information is available in the literature or is available for a similar species that can be used to inform life history parameters for the receptor.

Tables 23 and 24 provide receptors used in the north of I-10 and south of I-10 BERAs, respectively. Tables 25 and 26 provide assessment endpoints, lines of evidence, and measurement of exposure for the area north of I-10 and aquatic environment, and the area south of I-10, respectively.

Ecological Risk Characterization

The table below presents a summary of baseline ecological risks identified in the BERA (Integral 2013) for the area north of I-10 and aquatic environment.

Summary of Baseline Ecological Risks for the Area North of I-10 and Aquatic Environment

Receptor of Concern	Feeding Guild	Chemical of Concern	Baseline Risk Identified ¹
Benthic Macroinvertebrates			
Mollusks	Filter feeders	2,3,7,8-TCDD	Reproductive risks to mollusks (primarily in the area which surrounds the waste impoundments)
Individual mollusks	Filter feeders	2,3,7,8-TCDD	Low risks of reproductive effects (sediments adjacent to the upland sand separation area)
Birds			
Spotted sandpiper	Invertivore (probing)	Dioxins and furans	Moderate risks to individual birds, low risk to populations
Killdeer	Invertivore (terrestrial)	Dioxins and furans	Moderate risks to individual birds, low risk to populations
Killdeer	Invertivore (terrestrial)	Zinc	Low to negligible risk to populations
Mammals			
Marsh rice rat	Omnivore	TEQ _M	Risk to individual small mammals with home ranges that include areas adjacent to the impoundments, low to negligible risk to populations
Note: ¹ Risk to individuals of characterized as negligible are not included in this table. 2,3,7,8-TCDD – 2,3,7,8-tetrachlorodibenzo-p-dioxin Dioxins – polychlorinated dibenzo-p-dioxins Furans – polychlorinated dibenzofurans TEQ _M – toxicity equivalent quotient for 2,3,7,8-tetrachlorodibenzo-p-dioxin calculated using toxicity equivalent factors for mammals			

The table below presents a summary of baseline ecological risks identified in the BERA (Integral and Anchor 2013a) for the area south of I-10.

Summary of Baseline Ecological Risks for the Area South of I-10

Receptor of Concern	Feeding Guild	Chemical of Concern	Baseline Risk Identified ¹
Birds			
Terrestrial birds	--	Cadmium Chromium Copper	Low to negligible risks to the assessment endpoint of stable or increasing populations
Killdeer	Invertivore (terrestrial)	Lead Zinc	Risks to individual birds are present and population-level risks may be present
Note: ¹ Risk to individuals of characterized as negligible are not included in this table.			

2.7.3 Basis for Action

The response action selected in this ROD is necessary to protect the public health or welfare and the environment from actual or threatened releases of hazardous substances, as defined by NCP §300.5, into the environment.

2.8 REMEDIAL ACTION OBJECTIVES

RAOs describe what the proposed site cleanup is expected to accomplish. According to the NCP, 40 CFR §300.430(a)(1)(i), the “national goal of the remedy selection process is to select remedies that are protective of human health and the environment, that maintain protection over time, and that minimize untreated waste.” Based on information relating to types of contaminants, environmental media of concern, and potential exposure pathways, site specific RAOs were developed.

RAO 1: Eliminate loading of dioxins and furans from the former paper mill waste impoundments north and south of I-10, to sediments of the San Jacinto River.

RAO 2: Reduce human exposure to paper mill waste-derived dioxins and furans from consumption of fish by remediating sediments affected by paper mill wastes to appropriate cleanup levels.

RAO 3: Reduce human exposure to paper mill waste-derived dioxins and furans from direct contact with intertidal sediment by remediating sediments affected by paper mill wastes to appropriate levels.

RAO 4: Reduce human exposure to paper mill waste-derived dioxins and furans from direct contact with upland soils to appropriate cleanup levels.

RAO 5: Reduce exposures of benthic invertebrates, birds, and mammals to paper mill waste-derived dioxins and furans by remediating sediment affected by paper mill wastes to appropriate cleanup levels.

The RAOs developed consider the current and reasonably anticipated future land use including the use for industrial applications and by recreational fishers. While the BHHRA considered subsistence fisher populations, none have been identified at the site and therefore this receptor is not considered to be consistent with the current or future land use. Reducing exposure of human and ecological receptors of concern to dioxins and furans will mitigate site baseline risks identified in the BHHRA and BERAs and discussed in Section 2.7. The quantitative cleanup levels that need to be met to achieve the RAOs are presented in the table below.

Human Health Chemicals of Concern and Cleanup Levels

Chemical of Concern	Media	Cleanup Level	Basis for Cleanup Level
TEQ	Sediment	200 ng/kg ¹	Child Recreational Visitor ² , Calculated Risk Based Noncancer Endpoint ³
TEQ	Soil	240 ng/kg ¹	Construction Worker, Calculated Risk Based Noncancer Endpoint ³
Polychlorinated Biphenyls	Sediment	2 mg/kg ⁴	Recreational Fisher, Calculated Risk Based Noncancer Hazard Index ³
Note: ¹ Assumptions and derivations of cleanup levels are presented in Anchor 2016. ² Development of a cleanup level based on recreational fisher exposure would also be appropriate and considered, however the cleanup level based on exposure to a recreational visitor is more conservative and will therefore be protective of recreational fishers. ³ Calculations based on a relative bioavailability adjustment of 1. ⁴ Assumptions and derivations of cleanup levels are presented in Integral and Anchor 2013a ng/kg – nanograms per kilogram TEQ – 2,3,7,8-tetrachlorodibenzo-p-dioxin toxicity equivalent quotient			

Ecological Chemicals of Concern and Cleanup Levels

Chemical of Concern	Media	Cleanup Level	Basis for Cleanup Level
2,3,7,8-TCDD	Sediment		Benthic Invertebrates
Dioxins and furans	Sediment		Spotted sandpiper
Dioxins and furans	Sediment		Killdeer
TEQ _M	Sediment		Marsh rice rat
Cadmium	Soil		Terrestrial birds
Chromium	Soil		Terrestrial birds
Copper	Soil		Terrestrial birds
Lead	Soil		Killdeer
Zinc	Soil		Killdeer

Note:
Dioxins – polychlorinated dibenzo-p-dioxins
Furans – polychlorinated dibenzofurans
TEQ_M – toxicity equivalent quotient for 2,3,7,8-tetrachlorodibenzo-p-dioxin calculated using toxicity equivalent factors for mammals

2.9 DESCRIPTION OF ALTERNATIVES

The alternatives developed and presented in the FS (EPA 2016) are presented below. Each alternative presents a description of remedy components, common elements and distinguishing features, and expected outcomes of each alternative. Alternatives that address the area north of I-10 and aquatic environment include the letter “N” in the title (e.g., 1N, 2N) and alternatives that address the area south of I-10 include the letter “S” in the title (e.g., 1S).

2.9.1 Alternative 1N – Armored Cap and Ongoing Operations, Monitoring, and Maintenance (No Further Action)

As described in Section 2.2.5, the TCRA included capping the northern impoundments, selected stabilization of near surface soils in the western cell, installing a security fence, and posting warning signs. Under this alternative, the controls installed as part of the TCRA and as a result of the TCRA reassessment would remain in place and no additional remedial action would be implemented. This alternative includes ongoing operations, monitoring, and maintenance of the armored cap, which includes inspection and periodic maintenance (see Section 2.2.5 for details), and EPA 5-year reviews as required under the NCP in 40 CFR 300.430 (f)(iv)(2). The estimated cost of this alternative is \$9.5 million which includes the cost of the TCRA armored cap design and construction (Appendix A).

2.9.2 Alternative 2N – Armored Cap, Institutional Controls, and Monitored Natural Recovery

This alternative includes all of the elements discussed under Alternative 1N, plus ICs and MNR. Under this remedial alternative, the following ICs would be implemented:

- Restrictions on dredging and anchoring would be established to protect the integrity of the armored cap and to limit potential disturbance and resuspension of buried sediment near the upland sand separation area where one location exists with TEQ concentrations exceeding the sediment cleanup goal.

- Public notices and signage around the perimeter of the TCRA site would be maintained or provided, as appropriate.
- A periodic sampling and analytical program would also be implemented to monitor the progress of natural recovery.

The estimated cost for this alternative is \$10.3 million (Appendix A).

2.9.3 Alternative 3N – Permanent Cap, Institutional Controls, and Monitored Natural Recovery

This alternative includes the actions described under Alternative 2N plus additional enhancements to the TCRA armored cap to create a permanent cap. This alternative will increase the long-term stability of the armored cap consistent with permanent isolation of impacted materials. Cost estimates for this alternative also include additional measures to protect the permanent cap from potential vessel traffic in the form of a protective perimeter barrier and could include construction of a 5-foot high submerged rock berm outside the perimeter of the permanent cap, in areas where vessels could potentially impact the cap.

Enhancements to the armored cap would involve flattening the slopes of the existing cap by adding additional armor rock material to enhance the effectiveness and permanence by increasing the degree of safety. The permanent cap would include 1.5 for sizing the armor stone, flattening submerged slopes from 2 horizontal to 1 vertical (2H:1V) to 3H:1V, and flattening the slopes in the surf zone from 3H:1V to 5 horizontal to 1 vertical (5H:1V). The permanent cap would use larger rock sized for the “No Displacement” design scenario, which is more conservative than the “Minor Displacement” scenario used in the armored cap’s design. Upon completion, the Permanent Cap will be constructed to a standard that exceeds EPA and USACE design guidance, and meets or exceeds the recommended enhancements suggested by USACE in their 2013 evaluation.

Based on the production rates that were realized during TCRA construction, the duration of construction for this alternative is estimated to be 2 months. The cost of this alternative is estimated to be \$12.5 million (Appendix A).

2.9.4 Alternative 4N – Partial Solidification/Stabilization, Permanent Cap Institutional Controls, and Monitored Natural Recovery

This remedial alternative provides for solidification and stabilization (S/S) of the most highly contaminated material. A dioxin furan value that exceeds 13,000 ng/kg TEQ was used to define the most highly contaminated material. The extent of the area for partial S/S was defined, based on sediment and soil chemistry results presented in the RI Report, as the western cell and a portion of the eastern cell that is currently covered by the TCRA armored cap. The maximum depth of S/S in the western cell would be to approximately 10-feet below the current base of the armored cap and on average

approximately 5-feet below the current base of the armored cap in the eastern cell and northwestern area.

S/S treatment could be accomplished using large-diameter augers or conventional excavators. Before treating the sediment, the affected portions of the armored cap armor rock would need to be removed and stockpiled for reuse, if possible, or washed to remove adhering sediment and disposed in an appropriate upland facility. The geotextile and geomembrane would need to be removed and disposed of as contaminated debris. S/S reagents, such as Portland cement, would be delivered to the project work area, stockpiled, and mixed with sediment, as needed, to treat the sediment in situ. Submerged areas to be stabilized would need to be isolated from the surface water with sheetpiling and mostly dewatered prior to mixing with treatment reagents using conventional or long reach excavators in a fashion similar to the S/S work completed during the TCRA. For FS purposes, a sheetpile enclosure with a top elevation 2 feet above typical mean higher high water, or 3.5 feet North American Vertical Datum of 1988, has been assumed. Following completion of the S/S operation in submerged areas the sheetpile enclosure would be removed.

Finally, the permanent cap, as described in Alternative 3N, would be constructed, including replacement of the armor rock layer geomembrane and geotextile over the S/S footprint, and the measures described under Alternative 3N to protect the permanent cap from vessel traffic would be implemented.

The estimated footprint of this alternative is approximately 2.6 acres in the western cell and 1.0 acre of submerged sediment spanning the eastern cell and the northwestern area. Based on the horizontal and vertical limits identified for this alternative, a total of approximately 52,000 cy of soil and sediment would be treated.

Using production rates similar to that achieved during the TCRA, this alternative has an estimated construction duration of 17 months. As with Alternative 3N, access to the work area from the uplands will be required and could be a challenge, and an off-site staging area would be necessary to manage the materials generated during removal of the armored cap, and to stockpile and load the new armor rock materials to be placed for construction of the permanent cap. The cost of this alternative is estimated to be \$23.2 million (Appendix A).

2.9.5 Alternative 5N – Partial Removal, Permanent Cap, Institutional Controls, and Monitored Natural Recovery

This remedial alternative provides for removal and off-site disposal of the most highly contaminated material. A dioxin and furan value that exceeds 13,000 ng/kg TEQ was used to define the most highly contaminated material. The lateral and vertical extent and volume of sediment removed under this alternative is the same as the sediment to be treated as described in the previous section for Alternative 4N. Construction of a permanent cap, ICs, and MNR, as described in Alternative 3N, are also included in this remedial alternative.

To mitigate potential water quality issues, submerged areas would need to be isolated using berms, sheet piles, and/or turbidity barrier/silt curtains prior to excavating sediment. Upland areas would not need to be isolated with sheetpiling, but the excavation would require continuous dewatering and may need to be timed to try to avoid high water and times of year when storms are most likely.

Excavated sediment would be dewatered and potentially treated to eliminate free liquids prior to transporting it for disposal. Effluent from excavated sediment dewatering would need to be handled appropriately, potentially including treatment prior to disposal. Following completion of the excavation, the work area would be backfilled to replace the excavated sediment and then the permanent cap would be constructed, including replacing the armor rock layer above the excavation footprint and the geomembrane and geotextile layers.

The construction duration for this alternative is estimated to be 13 months. The cost of this alternative is estimated to be \$38.1 million (Appendix A).

2.9.6 Alternative 5aN - Partial Removal of Materials Exceeding Cleanup Levels, Permanent Cap, Institutional Controls, and Monitored Natural Recovery

For this removal alternative, the cleanup goal for a recreational visitor (200 ng/kg TEQ) was considered for the area within the armored cap which is either above the water or where the water depth is 10 feet or less. As an additional criterion, locations exceeding 13,000 ng/kg TEQ are also included regardless of water depth; however, all samples exceeding 13,000 ng/kg TEQ are located in areas where the water depth is 10 feet or less.

As with Alternatives 4N and 5N, the existing armored cap (consisting of cap rock, geomembrane, and geotextile) which currently isolates and contains impacted material would need to be removed prior to beginning excavation work.

This alternative also includes an engineered barrier to manage water quality during construction. In shallow water areas (water depths up to approximately 3 feet), this barrier would be constructed as an earthen berm, extending to an elevation at least 2 feet above the high water elevation in consideration of wind-generated waves and vessel wakes. The berm would be limited to a total height of 4 to 5 feet above the existing mudline for constructability reasons: as the berm height increases, the base width increases and it can be challenging to efficiently construct taller berms because they become wider at their base than the reach of a typical excavator. In areas with water depths deeper than about 3 feet, the berm would transition into a sheetpile barrier around the work area.

Work would be conducted in the wet. Excavated sediment would be offloaded, dewatered and stabilized at a dedicated offloading location, as necessary, to eliminate free liquids for transportation and disposal. Following removal of impacted sediment, the area from which sediments are removed would be covered with a residuals

management layer of clean cover material. In the deeper water areas of the TCRA Site where removal is not conducted, the existing armored cap would be maintained.

This alternative entails removal of approximately 137,600 cy of sediment. Alternative 5aN is estimated to have a construction duration of 19 months. The cost of this alternative is estimated to be \$77.9 million (Appendix A).

2.9.7 Alternative 6N - Full Removal of Materials Exceeding Cleanup Levels, Institutional Controls, and Monitored Natural Recovery

For the full removal alternative, the recreational visitor exposure scenario was considered for area north of I-10. The cleanup goal for protection of the recreational visitor is a TEQ concentration of 200 ng/kg.

The work area would be isolated with berms, sheet piles, and/or with turbidity barrier/silt curtains. As with the partial removal alternatives, cap rock, geomembrane and geotextile from the existing armored cap, which currently isolates and contains impacted material, would need to be removed prior to beginning excavation. Similarly, upland excavation could require dewatering to allow excavation of impacted sediment in relatively dry conditions, and excavation of submerged sediment would require isolation of the work area with a turbidity barrier/silt curtain. Excavated sediment would be further dewatered and stabilized at the offloading location, as necessary, to eliminate free liquids for transportation and disposal. Some operations, such as water treatment, could be barge mounted. Following removal of impacted sediment, the area from which sediments are removed would be covered with two residuals management layers of clean sediment to reduce intermixing.

This alternative entails removal of approximately 200,100 cy of sediment from the TCRA footprint and the area near the upland sand separation area, which would require a relatively large offloading and sediment processing facility to efficiently accomplish the work, which would require barge unloading, sediment re-handling, dewatering, stockpiling, transloading, and shipping to the off-site landfill facility. Additional activities would include management and disposal of dewatering effluent, including treatment if necessary.

Alternative 6N is estimated to have a construction duration of 16 months. The cost of this alternative is approximately \$99.2 million (Appendix A).

2.9.8 Alternative 1S – No Further Action

Under this remedial alternative for the area of investigation south of I-10, impacted soil would remain in place and no steps would be taken to alert future landowners or construction workers of the presence, at depth, of TEQ concentrations exceeding cleanup goals.

The estimated cost for this alternative, which includes future EPA 5-year review costs, is \$140,000. These EPA 5-year review costs are also included in cost estimates for the other alternatives.

2.9.9 Alternative 2S – ICs

This alternative would apply to locations in the area south of I-10 where the average TEQ concentration in the upper 10 feet of soil below grade exceeds the cleanup goal for the future construction worker (240 ng/kg TEQ). TEQ concentrations in the upper 10 feet of soil exceed the cleanup goal at four locations (SJSB012, SJSB019, SJSB023, and SJSB025).

Under this remedial alternative, the following ICs would be implemented:

- Deed restrictions would be applied parcels in which the depth-weighted average TEQ concentrations in upper 10 feet of subsurface soil exceed the soil cleanup goal for the future construction worker.
- Notices would be attached to deeds of affected properties to alert potential future purchasers of the presence of waste and soil with TEQ_M concentrations exceeding the soil cleanup goal.

The estimated cost for this remedial alternative is \$270,000 (Appendix A).

2.9.10 Alternative 3S – Enhanced ICs

This remedial alternative would incorporate the ICs identified in Alternative 2S and add physical features to enhance the effectiveness of the ICs. The physical features would include bollards to define the areal extent of the remedial action areas at the surface and a marker layer that would alert workers digging in the area that deeper soil may be impacted.

Implementation of this remedial alternative may include the following steps:

- Removing up to 2 feet of surface soil
- Temporarily stockpiling the soil on-site
- Placing the marker layer (such as a geogrid or similar durable and readily visible material) at the bottom of the excavation
- Returning the soil to the excavation and re-establishing vegetative cover
- Placing bollards at the corners of the remedial action areas.

The duration of construction for this remedial alternative is estimated to be 1 month. The estimated cost for this remedial alternative is \$670,000 (Appendix A).

2.9.11 Alternative 4S – Removal and Off-site Disposal

This remedial alternative involves excavation and replacement of soil in the three remedial action areas. Soil would be removed within these areas to a depth of 10 feet below grade. Implementation of this remedial alternative would require dewatering (groundwater lowering) to allow excavation of impacted soil in relatively dry conditions and may need to be timed to try to avoid high water and periods when storms are most likely. Excavated soil would be further dewatered, as necessary, and potentially treated to eliminate free liquids prior to transporting it for disposal. Effluent from excavation and subsequent dewatering would need to be handled appropriately, potentially including treatment prior to disposal. Excavated soil would be disposed of at an existing permitted landfill, the excavation would be backfilled with imported soil, and vegetation would be re-established.

An existing building (an elevated frame structure) and a concrete slab would need to be demolished and removed prior to excavating the underlying soil. These features would be replaced, if necessary.

The removal volume (50,000 cy) was calculated assuming a conservative excavation side slope of 2 horizontal to 1 vertical. Transportation and disposal costs were estimated assuming that all of the excavated material would be transported to a licensed landfill for disposal. During remedial design, potential cost savings associated with segregating clean soil and using it as backfill may be explored.

The duration of construction for this remedial alternative is estimated to be 7 months. The estimated cost for this remedial alternative is \$9.9 million (Appendix A).

2.10 COMPARATIVE ANALYSIS OF ALTERNATIVES

Nine criteria are used to evaluate the different remedial alternatives individually and against each other in order to select a remedy. The nine evaluation criteria are (1) overall protection of human health and the environment; (2) compliance with ARARs; (3) long-term effectiveness and permanence; (4) reduction of toxicity, mobility, or volume through treatment; (5) short-term effectiveness; (6) implementability; (7) cost; (8) state/support agency acceptance; and (9) community acceptance. The nine evaluation criteria are discussed below. Analysis for alternatives for the area north of I-10 and aquatic environment and alternatives for the area south of I-10 will be discussed separately because one alternative for each area must be selected.

2.10.1 Threshold Criteria

Of the nine criteria used to evaluate remedial alternatives, discussed above, the first two criteria are considered threshold criteria and must be met for an alternative to be a viable option.

Overall Protection of Human Health and the Environment

This criterion addresses whether each alternative provides adequate protection of human health and the environment and describes how risks posed through each exposure pathway are eliminated, reduced, or controlled, through treatment, engineering controls, and/or institutional controls. This criterion is considered a threshold and must be met by the selected alternative.

Compliance with Applicable or Relevant and Appropriate Requirements

Section 121(d) of CERCLA, 42 U.S. Code § 9621(d), and 40 CFR § 300.430(f)(1)(ii)(B) require that remedial actions at CERCLA sites at least attain legally applicable or relevant and appropriate federal and state requirements, standards, criteria, and limitations that are collectively referred to as ARARs, unless such ARARs are waived under CERCLA Section 121(d)(4), 42 U.S. Code § 9621(d)(4). This criterion is considered a threshold and must be met by the selected alternative.

Applicable requirements are those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility siting laws that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstances found at a CERCLA site. Only those state standards that are identified by a state in a timely manner and that are more stringent than federal requirements may be applicable. Relevant and appropriate requirements are those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility siting laws that while not “applicable” to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstances at a CERCLA site address problems or situations sufficiently similar to those encountered at the CERCLA site that their use is well-suited to the particular site. Only those state standards that are identified by a state in a timely manner and that are more stringent than federal requirements may be relevant and appropriate.

Compliance with ARARs addresses whether a remedy will meet all of the applicable or relevant and appropriate requirements of other Federal and State environmental statutes or provides a basis for invoking a waiver.

North of I-10 and Aquatic Environment

All of the remedial alternatives evaluated in this FS for the area north of I-10 satisfy the threshold criteria of protecting human health and the environment and addressing ARARs. The surface-weighted average TEQ concentration in surface sediments (which are associated with a variety of dioxin sources in addition to paper mill waste that was placed in the impoundments) was reduced by more than 80 percent by the implementation of the TCRA. Based on the fate and transport modeling, this reduction in sediment concentration translates to improvements in water quality at the site, even though there are ongoing inputs of dioxins and furans from sources other than the

impoundments. The current (post-TCRA) condition is such that there is little potential for exposure to TEQ concentrations unless there is a future release due to an extreme storm or hurricane, or a future release due to the impacts of a barge strike.

South of I-10

Other than Alternative 1S, the remedial alternatives for the area south of I-10 considered in this FS Report meet both of the threshold criteria: protectiveness and compliance with ARARs. The potentially affected receptor (future construction worker) would be protected from exposure to soil with elevated TEQ concentrations by warnings and restrictions (Alternatives 2S and 3S) or removal of impacted soil (Alternative 4S).

With reasonable care, any of the remedial alternatives could be implemented in compliance with ARARs. Soil that is removed (Alternative 4S) would be transported in compliance with TxDOT standards and permanently managed in a permitted landfill cleared by the EPA's regional off-site rule contact.

2.10.2 Long-Term Effectiveness and Permanence

Long-term effectiveness and permanence refers to the expected residual risk and the ability of a remedy to maintain reliable protection of human health and the environment over time, once cleanup levels have been met. This criterion includes the consideration of residual risk that will remain onsite following remediation and the adequacy and reliability of controls.

North of I-10 and Aquatic Environment

The long-term effectiveness evaluation of MNR-based remedies projects that the surface weighted average concentration of TEQ will decrease by approximately a factor of two in a 10- to 15-year time frame due to natural sedimentation processes in the river. Construction of the armored cap reduced surface weighted average concentration TEQ by approximately 80 percent, and natural recovery will continue to reduce concentrations because of the ongoing input of sediment with low TEQ concentrations from upstream sources.

Alternative 1N does not include ICs and MNR is not assessed over time, so the long-term effectiveness of this alternative ranks lower than all of the other alternatives. The existing armored cap is not further enhanced in Alternatives 1N or 2N compared to Alternative 3N, which could increase the need for future long-term monitoring and maintenance under Alternatives 1N and 2N.

The evaluations performed to address the permanence of the existing repaired TCRA cap with the proposed modifications outlined in the capping Alternative 3N showed that the cap is expected to be stable and permanent, requiring only maintenance or repair following unusual catastrophic events. The expected losses from such events would be expected to be small, comparable or smaller than losses from removal of the contaminated sediment as predicted for dredging Alternative 6N. However, the uncertainty inherent in any quantitative analysis technique used to estimate the

long-term (500 years) reliability of the cap is very high. This includes the empirical analysis developed by Maynard (2000) to estimate the potential scour of the cap due to prop wash generated by ship traffic since a lot of the site data needed to properly perform this analysis were not available. The latter analysis probably has the smallest uncertainty associated with any of the evaluations performed to assess the long term reliability of the cap, and its estimated uncertainty is at least \pm one order of magnitude. So, if the estimate of prop induced scour is 10 centimeters, then than range of uncertainty would be from 1 to 100 centimeters. This estimate of the uncertainty takes into account the lack of a complete data set for the site and the uncertainty in Maynard's empirically based methodology itself. Further, changes in channel planform morphology due to bank erosion, shoreline breaches, etc. during a high flow event caused by a major flood or hurricane as occurred in other areas of the San Jacinto River during the 1994 storm is beyond the ability of existing sediment transport models to simulate.

The impact of continued subsidence on the integrity and reliability of the existing cap to prevent any release of contaminated material would be dependent on the long-term rate of subsidence. The latter is not well known and cannot be predicted with any reliability. In general, subsidence and the slow rise in sea level would both result in slightly deeper water depths over the eastern cell and northwestern area of the cap, but it is not believed that these effects would be substantial enough to affect the tidal, river and wind induced circulation in the San Jacinto River estuary. As such, it is not believed that the material. All of the alternatives that involve removal of part or all of the cap will result in releases during construction, however these releases would be mitigated by using best management practices (BMPs) including excavation in the dry where possible, berms, sheet piles, silt curtains, cap removal in sections, etc.

There will also be a requirement for a residuals management cover or backfill over the excavated areas for Alternatives 5N, 5aN, and 6N.

The Alternative 6N construction releases, which may be the most extensive of all the alternatives, are predicted to result in TCDD increases of 3 to 10 ng/kg over most of the site, with increases of over 30 ng/kg immediately adjacent to the waste pits. However, the use of BMPs as described above would reduce the impact of TCDD resuspension. For Alternative 1N, the no action alternative, the initial TCDD present over the site is approximately 8 ng/kg. Therefore, the total TCDD present following construction of Alternative 6N would be 18 ng/kg (8 ng/kg initial plus 10 ng/kg increase) over the site, but well below the cleanup goal of 200 ng/kg. The model-predicted decline of TCDD in surface sediment concentrations within the site corresponds to a half-life of 11 years. Although the model results vary year-to-year due to differences in flow conditions (which drive differences in sediment transport), the nature of the predicted recovery curve (i.e., an exponential decline) exhibits an asymptotic behavior, which is expected because concentrations of dioxins/furans would be expected to approach regional background concentrations associated with remaining sources of dioxins and furans (i.e., point and non-point sources, transport from upstream, etc.) in the area. Alternative 6N has the greatest long-term effectiveness and protectiveness of all the alternatives because all of the waste material would be removed and not subject to the potentially severe conditions in the San Jacinto River, and because any construction related releases

would result in sediment concentrations initially well below the cleanup goal with further sediment concentration declines over the long term..

The long-term impacts of dredge residuals and releases during construction are also evident in the model-predicted water column concentrations at the end of the long-term simulation. However, the actual impact of dredge residuals will be reduced by the use of BMPs, including using a two layer residuals cover system. These predictions include several sources of dioxins and furans, including atmospheric deposition, upstream sources, and point sources, such as releases from wastewater treatment plant outfalls, in addition to the dioxin-impacted materials potentially released during dredging and S/S activities.

South of I-10

As noted in the previous section, soil with TEQ concentrations exceeding the cleanup goal is isolated from the surface by clean overburden. The only route of potential exposure is through excavation into the impacted depth interval. Through the use of appropriate personal protective equipment and proper management of excavated soil, the potential risks posed by the impacted soil can be reliably and effectively managed. The physical markers (Alternative 3S) would draw attention to the ICs and enhance their effectiveness. Alternative 4S would achieve long-term effectiveness by permanently removing the impacted soil from the 0- to 10-foot depth interval from the site and securely disposing of the soil in a permitted landfill. While the ICs, particularly with the addition of physical markers (Alternative 3S), would provide reliable long-term protection, they rely on the integrity of future construction workers to comply with the restrictions. Therefore, complete removal of the impacted soil in the depth interval of potential excavation (Alternative 4S) may provide a somewhat higher level of long-term effectiveness because it is not subject to inappropriate future use of the area.

2.10.3 Reduction of Toxicity, Mobility, or Volume through Treatment

Reduction of toxicity, mobility, or volume through treatment refers to the anticipated performance of the treatment technologies that may be included as part of the remedy.

North of I-10 and Aquatic Environment

Alternatives 1N and 2N do not include additional measures to reduce the toxicity, mobility or volume of material. However, a portion of the soils in the western cell were previously solidified during the TCRA. Thus, these alternatives are comparable in reduction of toxicity, mobility, or volume of material. Alternative 3N further reduces potential mobility within the TCRA site by increasing the protection of the armored slopes, and thus ranks more favorably than Alternatives 1N and 2N. Alternatives 4N and 5N take additional measures through S/S (Alternative 4N) or removal (Alternative 5N) of approximately 52,000 cy of sediments and soils, and are comparatively better than Alternative 3N for reduction of toxicity, mobility, or volume of material. Potential mobility of the highest concentration materials addressed in Alternatives 4N and 5N would be increased during remedy implementation, somewhat

offsetting any reduction in toxicity, mobility, or volume of material. Alternative 5aN removes approximately 137,600 cy of sediment, and thus compares more favorably for reduction of toxicity, mobility, or volume of material than Alternatives 4N and 5N, but subject again to possible issues related to mobility of materials during remedy implementation. Alternative 6N has the greatest volume of removal – 200,100 cy. This alternative is more effective in reducing the toxicity, mobility, and volume of waste compared all of the other alternatives.

South of I-10

Alternatives 2S and 3S do not include any treatment of impacted soil. Alternative 4S would include some treatment of excavated soil, as needed to eliminate free liquids for transportation and disposal. The treatment may involve amendment of the soil with Portland cement, which would reduce the potential mobility of COCs. Water removed from the excavation would be treated, if necessary, to reduce toxicity prior to discharge.

2.10.4 Short-Term Effectiveness

Short-term effectiveness addresses the period of time needed to implement the remedy and any adverse impacts that may be posed to workers, the community, and the environment during construction and operation of the remedy until cleanup levels are achieved.

North of I-10 and Aquatic Environment

Alternatives 1N and 2N do not entail any construction, and thus have no short-term impacts. Alternative 3N has the shortest duration of the remaining alternatives, does not result in water column, sediment, or tissue impacts (except for minor turbidity during armor rock placement), and has the lowest risk to worker safety, the lowest greenhouse gas and particulate matter emissions, and the least traffic and ozone (smog) impact. Further, Alternative 3N does not disturb the armored cap or require handling of sediments. Compared to Alternatives 4N, 5N, 5aN, and 6N, which have longer durations, Alternative 3N ranks more favorably for short-term effectiveness.

Alternatives 4N, 5N, 5aN, and 6N each have risk of short-term impacts associated with residuals and releases during construction. Because of their longer duration these alternatives also have a higher likelihood that a high-water event during construction could overtop perimeter water quality control features, which would exacerbate short-term impacts because the armor cap needs to be removed to accomplish the work. Alternatives 4N, 5N, 5aN, and 6N have a model-predicted increase in water column TCDD concentrations averaged of five-fold, twenty-fold, thirty-fold, and one hundred-fold, respectively, over alternatives 1N, 2N, and 3N. However, the actual levels would be reduced by the use of BMPs during construction.

Alternative 4N has a longer construction duration than Alternatives 5N and 6N and all entail removing portions of the armored cap and managing a volume of sediments. Compared to Alternative 3N, there is higher risk to worker safety (8 to 9 times the

number of injuries and fatalities, and higher environmental impacts (8 to 9 times the number of hours of operation and truck trips, due to releases that would be expected during construction. Alternative 4N is considered similar to Alternative 5N for emissions of ozone precursors, particulate matter (smog-forming) and greenhouse gases; under Alternative 4N, construction is limited to work within the site perimeter and does not result in additional emissions during off-site shipment of sediments, but this is counterbalanced by the shorter duration of Alternative 5N.

Alternative 5aN has the longest construction duration. Alternatives 5aN and 6N are the least favorable for short-term effectiveness. The greater number of work hours has attendant higher worker safety risk (20 times the number of injuries and fatalities compared to Alternative 3N, and higher emissions of ozone precursors, particulate matter (smog-forming) and greenhouse gases (20 times the number of equipment operating hours and truck trips compared to Alternative 3N, and the time required for Alternatives 5aN and 6N to achieve protection is also longer. Alternative 6N also has the most short-term environmental impact due to model-generated water column releases during dredging, and the expected localized increase in tissue concentrations from these releases, as well as generated dredge residuals, that the model predicts may increase the overall surface weighted average concentration TEQ immediately following dredging. However, the actual levels would be reduced by the use of BMPs during construction, including excavation in the dry, etc.

South of I-10

Alternative 2S does not entail any construction, and thus has no short-term impacts. Excavations (Alternatives 3S and 4S) would require BMPs to control dust and stormwater. Short-term impacts associated with Alternative 3S would be minimal given the shallow depth of excavation, limited volume of material that would be moved, and absence of significant concentrations of COCs in the shallow soil. Alternative 4S would require exposing soil with TEQ concentrations exceeding the PRG, which introduces the potential for exposure to COCs through direct contact with the soil, inhalation or ingestion of impacted dust, and contact with impacted soil suspended in runoff. The volume of soil and the duration of the project would also be greater than for Alternative 3S, and Alternative 4S would require off-site transportation of the soil to a disposal facility, increasing the potential for exposure to COCs, emissions of greenhouse gasses, nitrogen oxides, and particulate matter, and potential tracking of COCs off-site. However, measures would be implemented to reduce the amount of any materials lost during transportation.

2.10.5 Implementability

Implementability addresses the technical and administrative feasibility of a remedy from design through construction and operation. Factors such as availability of services and materials, administrative feasibility, and coordination with other governmental entities are also considered.

North of I-10 and Aquatic Environment

Alternatives 1N and 2N do not have any implementability issues because they do not entail construction. Both are more favorable from an implementability standpoint compared to Alternatives 3N, 4N, 5N, 5aN, and 6N. Alternative 3N is a short-duration project that entails proven technology (i.e., the same activities were demonstrated during construction of the armored cap) that can be deployed with readily-available materials and local, experienced contractors.

Implementability concerns, such as TCRA site access, limited staging areas, restrictions on equipment size, and availability of off-site staging area properties are greater for Alternatives 4N, 5N, 5aN, and 6N compared to Alternative 3N because of the much larger scope and scale of these alternatives. Identifying and securing an off-site staging area is considered an even greater challenge for Alternatives 5N, 5aN, and 6N compared to Alternative 4N because dredged sediment would need to be managed at the off-site staging area, which requires a larger footprint, and given the nature of the dredged material, might make finding a willing landowner difficult. Proper management of cap material and excavated wastes, and on-site processing and management for dredged sediments for off-site transportation to neighboring roadways, will be critical for effective implementation of Alternatives 5N, 5aN, and 6N. Finding a suitable off-site facility for Alternatives 5N, 5aN, and 6N is considered a more significant implementability challenge than Alternative 4N because the former alternatives will manage dredged sediments at the facility. Compared to Alternative 5N, this issue is magnified for Alternatives 5aN and 6N because of the greater volume of material that must be handled at the off-site facility. Based on these factors, Alternative 3N is less favorable than Alternatives 1N and 2N, but more favorable than the remaining alternatives.

Alternative 4N requires the removal of the armored cap, and requires S/S to be completed for an area of sediments that is typically submerged and would need to be dewatered, which is considered a technical challenge. Engineering controls for Alternative 4N may not be adequate to prevent the release of sediments exceeding cleanup goals to the surrounding environment; this would be especially true during potential high flow events that could occur during construction. Alternative 4N is considered to be less favorable for implementability compared to Alternative 3N.

Alternatives 5N, 5aN, and 6N also require removal of the armored cap and management of sediment and soil for off-site disposal. Similar to Alternative 4N, engineering controls may not be adequate to prevent the release of sediments exceeding cleanup goals to the surrounding environment. For Alternatives 4N through 6N there is a 30 to 40 percent chance that a high water event could occur during construction resulting in overtopping of the engineering controls. Thus, all of these alternatives are considered equally less favorable as Alternative 4N for implementability compared to Alternatives 1N, 2N, and 3N.

South of I-10

There are no significant implementability concerns associated with Alternatives 2S and 3S. None of the alternatives requires specialized equipment, techniques, or personnel.

Coordination with property owners would be required to establish ICs and for access to the project work site. Alternative 4S would involve more physical activity for implementation, including off-site transportation of impacted soil, but the operations are routine for remedial actions. The additional implementability concerns are the increased truck traffic on Market Street and the potential for flooding while impacted soil is exposed during implementation of Alternative 4S. Provisions may need to be made to handle the additional volume of traffic. The duration of the excavation should not exceed 7 months and implementation could be timed for periods when high water is least likely.

2.10.6 Costs

The estimated present worth costs for alternatives range from \$9.5 million for Alternative 1N to \$99.2 million for Alternative 6N and from \$0.14 million for Alternative 1S to \$9.93 million for Alternative 4S. Cost for each alternative are presented in the table below. Detailed cost estimates are provided in Appendix A.

Summary of Estimated Costs for Alternatives

Area Alternative Applies To	Alternative	Estimated Cost ¹
North of I-10 and Aquatic Environment	1N – Armored Cap, Operations, Monitoring, and Maintenance	\$9.5M
	2N – Armored Cap, Institutional Controls, and Monitored Natural Recovery	\$10.3M
	3N – Permanent Cap, Institutional Controls, and Monitored Natural Recovery	\$12.5M
	4N – Partial Solidification/Stabilization, Permanent Cap, Institutional Controls, and Monitored Natural Recovery	\$23.2M
	5N – Partial Removal, Permanent Cap, Institutional Controls, and Monitored Natural Recovery	\$38.1M
	5aN – Partial Removal of Materials Exceeding Cleanup Goals, Permanent Cap, Institutional Controls, and Monitored Natural Recovery	\$77.9M
South of I-10	6N – Full Removal of Materials Exceeding Cleanup Goals, Institutional Controls, and Monitored Natural Recovery	\$99.2M
	1S – No Further Action	\$0.14M
	2S – Institutional Controls	\$0.27M
	3S – Enhanced Institutional Controls	\$0.67M
	4S – Removal and Off-Site Disposal	\$9.93M
Note: ¹ Total costs for north of I-10 and aquatic environment include \$9 million for the TCRA armored cap. M - million TCRA – time critical removal action		

2.10.7 State/Support Agency Acceptance

This section will need to be completed following discussion with TCEQ.

2.10.8 Community Acceptance

Community acceptance of the Selected Remedy was determined through the Public Comment process (see Responsiveness Summary- Part 3). Based on EPA's interpretation of comments received during the public comment period and the questions received at the public meeting, the community [accepts OR does not accept] the selected remedy identified in this ROD.

2.11 PRINCIPAL THREAT WASTES

The NCP establishes an expectation that EPA will use treatment to address the principal threats posed by a site wherever practicable (NCP § 300.430(a)(1)(iii)(A)). In general, principal threat wastes are those source materials considered to be highly toxic or highly mobile which generally cannot be contained in a reliable manner or would present a significant risk to human health or the environment should exposure occur. The “principal threat” concept is applied to the characterization of “source materials” at a Superfund site. At the site, the northern waste pits sediment contain calculated TEQ over 43,000 ng/kg, and the Southern Impoundment soils contain calculated TEQ over 50,000 ng/kg. The northern waste pits sediment maximum TEQ is 215 times higher than the noncancer hazard based cleanup goal and the Southern Impoundment maximum TEQ is 208 times higher than the noncancer hazard based cleanup goal. The baseline noncancer HI for a recreational visitor exposure to sediments at the site is 60, which is more than an order of magnitude greater than the acceptable HI of 1. Dioxin and furans are highly persistence chemicals and will not breakdown for hundreds of years. There is considerable uncertainty regarding biodegradation of dioxins and furans, however by one estimate, the dioxin and furans will remain at the site above the cleanup goals for approximately 750 years (Khoury 2016).

The site is located in the San Jacinto River, which has experienced a number of severe storms and floods in the past. For example, the 1994 flood exceeded the 100-year return period storm, resulted in severe riverbed scour while cutting of new channels outside of the river bed, destroyed or damaged thousands of homes, and undermined and ruptured pipelines both inside and outside of the river channel. The 1994 storm crested at 27.09 feet at the Sheldon, Texas gauge located about five miles upstream of the site. Previous storm resulted in even higher crests of 31.5 feet 1940 and 32.90 feet in 1929.

Because of the elevated concentrations of dioxin and furans, which are over two orders of magnitude higher than the acceptable concentration, and the highly toxic and persistence nature, there is a significant risk to human health or the environment should exposure occur. With the regular occurrence of severe storms and flooding in the area, there is uncertainty that the waste material can be reliably contained over the long term and therefore should be considered highly mobile. Because the dioxin and furan waste in the northern impoundments and southern impoundment at the San Jacinto River Waste Pits Site is both highly toxic and highly mobile, it is considered a principle threat waste.

2.12 SELECTED REMEDY

Based on consideration of the requirements of CERCLA, the detailed analysis of remedial alternatives, and consideration of public comments, EPA has selected Alternatives 6N and 4S as the Selected Remedy. This section provides EPA’s rationale for the Selected Remedy, and a description of its anticipated scope, how the remedy will be implemented, and its expected outcomes.

2.12.1 Summary of the Rationale for the Selected Remedy

The Selected Remedy is protective of human health and the environment, complies with ARARs, and provides the best balance of tradeoffs among the balancing criteria. It reduces risks within a reasonable time frame, provides for long-term reliability of the remedy, and minimizes reliance on institutional controls. It will achieve substantial risk reduction by removing the most contaminated materials, reduces remaining risks in the aquatic environment to the extent practicable through MNR, and manages the remaining risks to human health through ICs.

EPA considered several options for contaminated materials. EPA selected a remedy that includes full removal of contaminated materials above cleanup levels for the following reasons:

- The material is highly toxic and under baseline conditions highly mobile and therefore is considered a principal threat waste.
- The location of materials, either partially submerged within the San Jacinto River (northern impoundments) or on a small peninsula on the San Jacinto River (southern impoundment), result in limited ability to treat the waste in place without the threat of a release during the remedial action.
- The area has a high threat of repeated storm surges and flooding from hurricanes and tropical storms, which if the material was left in place, could result in a release of hazardous substances.

For all of these factors, the Selected Remedy provides greater permanence in comparison to other alternatives. Less costly alternatives rely on remedies that have a higher chance of failure by leaving principal threat waste source materials in the river, resulting in greater uncertainty as to their long-term effectiveness.

2.12.2 Description of the Selected Remedy

The Selected Remedy is a final action for the San Jacinto River Waste Pits Site. It addresses site related unacceptable human health risks associated with consumption of fish and direct contact (skin contact and incidental ingestion) with sediment and soil. It also addresses site related ecological risks to bottom-dwelling organisms (benthic invertebrates), birds, and mammals.

The Selected Remedy includes excavation and off-site disposal of principal threat waste source materials (i.e., mobile and highly-toxic sediment and soil) from impoundments in and adjacent to the San Jacinto River. ICs will be used to prevent disturbance of the remediated areas (e.g., dredging, anchoring, construction, and excavation) and alert future property owners of subsurface materials exceeding cleanup goals. MNR will be used to ensure remedy protectiveness in the aquatic environment.

North of I-10 and Aquatic Environment

For the full removal alternative, the recreational visitor exposure scenario was considered for area north of I-10. The cleanup goal for protection of the recreational visitor is a TEQ concentration of 200 ng/kg. Figures 23 and 24 present the area to be remediated.

The work area would be isolated with berms, sheet piles, and/or with turbidity barrier/silt curtains. As with the partial removal alternatives, cap rock, geomembrane and geotextile from the existing armored cap, which currently isolates and contains impacted material, would need to be removed prior to beginning excavation. Similarly, upland excavation could require dewatering to allow excavation of impacted sediment in relatively dry conditions, and excavation of submerged sediment would require isolation of the work area with a turbidity barrier/silt curtain. Excavated sediment would be further dewatered and stabilized at the offloading location, as necessary, to eliminate free liquids for transportation and disposal. Some operations, such as water treatment, could be barge mounted. Following removal of impacted sediment, the area from which sediments are removed would be covered with two residuals management layers of clean sediment to reduce intermixing.

This alternative entails removal of approximately 200,100 cy of sediment from the TCRA footprint and the area near the upland sand separation area, which would require a relatively large offloading and sediment processing facility to efficiently accomplish the work, which would require barge unloading, sediment re-handling, dewatering, stockpiling, transloading, and shipping to the off-site landfill facility. Additional activities would include management and disposal of dewatering effluent, including treatment if necessary.

South of I-10

This remedial alternative involves excavation and replacement of soil in the three remedial action areas (Figure 25). Soil would be removed within these areas to a depth of 10 feet below grade. Implementation of this remedial alternative would require dewatering (groundwater lowering) to allow excavation of impacted soil in relatively dry conditions and may need to be timed to try to avoid high water and periods when storms are most likely. Excavated soil would be further dewatered, as necessary, and potentially treated to eliminate free liquids prior to transporting it for disposal. Effluent from excavation and subsequent dewatering would need to be handled appropriately, potentially including treatment prior to disposal. Excavated soil would be disposed of at an existing permitted landfill, the excavation would be backfilled with imported soil, and vegetation would be re-established.

An existing building (an elevated frame structure) and a concrete slab would need to be demolished and removed prior to excavating the underlying soil. These features would be replaced, if necessary.

The removal volume (50,000 cy) was calculated assuming a conservative excavation side slope of 2 horizontal to 1 vertical. Transportation and disposal costs were estimated assuming that all of the excavated material would be transported to a

licensed landfill for disposal. During remedial design, potential cost savings associated with segregating clean soil and using it as backfill may be explored.

2.12.3 Summary of the Estimated Remedy Costs

The information in the cost estimate summary tables presented below are based on the best available information regarding the anticipated cope of the remedial alternative. Changes in the cost elements are likely to occur as a result of new information and data collected during the engineering design of the remedial alternative. Major changes may be documented in the form of a memorandum in the Administrative Record file, an Explanation of Significant Differences, or a ROD amendment. This is an order-of-magnitude engineering cost estimate that is expected to be within plus 50 to minus 30 percent of the actual project cost.

Engineer's Estimate for Alternative 6N

Item	Description	Quantity	Unit	Unit Price	Total
DIRECT CONSTRUCTION COSTS					
0001	Mobilization/Demobilization	\$ 56,962,000	%	8%	\$ 4,560,000.00
0002	Environmental Protection and Erosion Control	1	LS	\$300,000	\$ 300,000.00
0003	Construction Payment and As-Built Surveys	1	LS	\$300,000	\$ 300,000.00
0004	Construction Materials Testing	2	EA	\$15,000	\$ 30,000.00
0005	Silt Curtain	1	LS	\$100,000	\$ 100,000.00
0006	Additional Armor Rock Placement	0	TON	\$107	\$ -
0007	Remove Armored Cap - Land Based	6,200	CY	\$72	\$ 443,000.00
0008	Remove Armored Cap - Water Based	23,700	CY	\$92	\$ 2,180,000.00
0009	Wash Water Armored Cap - Treat and Dispose	2,702	TON	\$530	\$ 1,432,000.00
0010	Dispose Armored Cap - Debris Landfill	54,000	TON	\$48	\$ 2,576,000.00
0011	Water-based Excavation/Dredging	200,100	CY	\$46	\$ 9,205,000.00
0012	Land-based Excavation	0	CY	\$12	\$ -
0013	Sediment Residuals Cover	19,800	CY	\$30	\$ 594,000.00
0014	Sediment Stabilization prior to Shipment	200,100	CY	\$30	\$ 5,911,000.00
0016	Haul & Disposal of Sediment to Class 1 Landfill	308,100	TON	\$110	\$ 33,891,000.00
0017	Replace Geotextile	0	SY	\$6.25	\$ -
0018	Replace Armor Rock A/B	0	TON	\$78	\$ -
0019	Replace Armor Rock C/D	0	TON	\$107	\$ -
DIRECT CONSTRUCTION TOTAL:					\$ 61,522,000.00
IN-DIRECT CONSTRUCTION COSTS					
0020	Engineering Design	\$ 61,522,000	%	6%	\$ 3,691,320.00
0021	Construction Administration/Observation	\$ 61,522,000	%	6%	\$ 3,691,320.00
0022	EPA 5 Year Review (Net Present Value)	1	LS	\$108,000	\$ 108,000.00
0023	Institutional Controls (Net Present Value)	1	LS	\$70,000	\$ 70,000.00
0024	Long Term MNR Monitoring (Net Present Value)	1	LS	\$264,000	\$ 264,000.00
0025	Long Term Cap Monitoring (Net Present Value)	0	LS	\$88,000	\$ -
0026	Cap Maintenance (Net Present Value)	0	LS	\$181,000	\$ -
IN-DIRECT CONSTRUCTION TOTAL:					\$ 7,824,640.00
PROJECT TOTAL					\$ 69,346,640.00
PROJECT ROUNDED TOTAL:					\$ 69,400,000.00
30% Contingency					\$ 20,820,000.00
TCRA Design and Construction Cost					\$ 9,000,000.00
TOTAL ESTIMATED COST FOR 6N					\$ 99,220,000.00

Engineer's Estimate for Alternative 4S

Item	Description	Quantity	Unit	Unit Price	Total
DIRECT CONSTRUCTION COSTS					
0001	Mobilization/Demobilization	1	LS	\$250,000	\$ 250,000.00
0002	Environmental Protection and Erosion Control	1	LS	\$5,000	\$ 5,000.00
0003	Construction Surveys, Site Preparation & Utility Clearance	1	LS	\$20,000	\$ 20,000.00
0004	Bollards	0	EA	\$741.26	\$ -
0005	Land-based Soil Excavation	50,000	CY	\$12.00	\$ 600,000.00
0006	Marker Layer	0	SY	\$0.67	\$ -
0007	Replace Excavated Soil	0	CY	\$3.50	\$ -
0008	Vegetative Cover	3	AC	\$4,000.00	\$ 14,000.00
0009	Wellpoint Dewatering and Treatment	1	LS	\$400,000.00	\$ 400,000.00
0010	Stabilization of Soil Prior to Shipment	25,000	CY	\$30.0	\$ 750,000.00
0011	Off-site Haul and Disposal of Sediment (Class 2)	75,384	TON	\$55.0	\$ 4,146,000.00
0012	Backfill	50,000	CY	\$11.25	\$ 563,000.00
0013	Demo 6" Thick Concrete Pad	9,710	SF	\$7.57	\$ 74,000.00
0014	Demo House	800	SF	\$7.89	\$ 6,000.00
0015	Replace House	800	SF	\$125.00	\$ 100,000.00
0016	Replace 6" Thick Concrete Pad	9,710	SF	\$5.38	\$ 52,000.00
DIRECT CONSTRUCTION TOTAL:					\$ 6,980,000.00
INDIRECT CONSTRUCTION COSTS					
0017	Engineering Design	1	LS	\$200,000	\$ 200,000.00
0018	Construction Administration/Observation	\$ 6,980,000	%	5%	\$ 349,000.00
0019	EPA 5 Year Review (Net Present Value)	1	LS	\$108,000	\$ 108,000.00
0020	Soil Management Plan and Notices	0	LS	\$100,000	\$ -
IN-DIRECT CONSTRUCTION TOTAL:					\$ 657,000.00
PROJECT TOTAL					\$ 7,637,000.00
PROJECT ROUNDED TOTAL:					\$ 7,640,000.00
TOTAL ESTIMATED COST FOR 4S (with 30 percent contingency)					\$ 9,932,000.00

2.12.4 Expected Outcomes of Selected Remedy

The intent of the Selected Remedy is to be protective of human health and the environment and to attain ARARs. It is consistent with current and reasonably anticipated future uses of the land and river. It is also intended to minimize reliance on ICs to the extent practicable. The Selected Remedy will reduce sediment and soil contamination and remove principal threat waste from the site in order to achieve long-term protectiveness.

2.13 STATUTORY DETERMINATIONS

Under CERCLA section 121, 42 U.S. Code §9621, the EPA must select remedies that are protective of human health and the environment, comply with ARARs (unless a statutory waiver is justified), are cost-effective, and utilize permanent solutions and alternative treatment technologies or resource recovery technologies to the maximum extent practicable. In addition, CERCLA includes a preference for remedies that employ treatment that permanently and significantly reduce the volume, toxicity, or mobility of hazardous wastes as their principal element. The following sections discuss how the selected remedy meets these statutory requirements.

2.13.1 Protection of Human Health and Environment

The Selected Remedy will protect human health and the environment by removing contaminated materials from the site, capping residual material left post-dredging activities, using MNR to further reduce concentrations in less contaminated areas, and placing ICs as necessary. Specifically the exposure of recreational fishers and recreational visitors to dioxins and furans will be reduced through removal of the contaminated materials to risk based cleanup levels. Exposure of future construction workers to dioxins and furans in contaminated soil will not occur because soil above the risk based cleanup level will be removed from the site to a depth of 10 feet below grade. Ecological receptors (benthic invertebrates, birds, and mammals) will be protected because there will no longer be an exposure pathway to contaminated materials.

2.13.2 Compliance with Applicable or Relevant and Appropriate Requirements

The NCP §§ 300.430(f)(5)(ii)(B) and (C) require that a ROD describe the Federal and State ARARs that the Selected Remedy will attain or provide justification for any waivers. The implementation of the remedy generally will not require Federal, State, or local permits because of the permit equivalency of the CERCLA remedy-selection process (40 CFR 300.400(e)(i)), but remedial actions will be completed in conformance with substantive technical requirements of applicable regulations.

The ARARs can be broken out into three different categories, although some ARARs may belong to more than one of these categories:

- Chemical-specific requirements
- Location-specific requirements
- Performance, design, or other action-specific requirements.

Chemical Specific

Chemical-specific ARARs are typically the environmental laws or standards that result in establishment of health- or risk-based numerical values. Chemical specific ARARs include Clean Water Act (CWA) criteria and State water quality and waste standards.

Section 303 and 304 of the Clean Water Act and Texas Surface Water Quality Standards - Section 303 of the CWA requires states to promulgate standards for the

protection of water quality based on Federal water quality criteria. Federal water quality criteria are established pursuant to Section 304. Texas Surface Water Quality Standards are relevant to the evaluation of short-term and long-term effectiveness of the remedial alternatives.

Section 401 Water Quality Certification of the Clean Water Act as Administered by Texas - Section 401 requires that the applicant for Federal permits obtain certification from the appropriate State agency that the action to be permitted will comply with State water quality standards. Although environmental permits are not required for on-site CERCLA response actions, the selected remedy will incorporate elements to comply with State water quality standards. Consultation with the TCEQ may be necessary to confirm that the final design of the selected alternative meets the substantive requirements of Section 401 of the CWA.

Section 404 and 404 (b)(1) of the Clean Water Act - Section 404 requires that discharges of fill to waters of the United States serve the public interest. In selecting a remedial alternative including discharge of fill, EPA would be required to make the determination that the placement of materials into the San Jacinto River serves the public interest as necessary to remediate source material from within the EPA's Preliminary Site Perimeter. The area within the EPA's Preliminary Site Perimeter includes wetlands in the area north of I-10, and a plan will need to be established that addresses the requirements (to the extent practicable) of Section 404 and 404(b)(1).

Location Specific

Location-specific ARARs include restrictions placed on concentrations of hazardous substances or the implementation of certain types of activities based on the location of a site. Some examples of specific locations include floodplains, wetlands, historic places, land use zones, and sensitive habitats. Location-specific ARARs include the Rivers and Harbors Act, Coastal Zone Management Act, and Federal Emergency Management Agency/National Flood Insurance Program regulations.

Rivers and Harbor Act and Texas State Code Obstructions to Navigation - The site is within a navigable waterway, and the State of Texas regulates the obstruction of navigable waters within the State involving the construction of structures, facilities, and bridges or removal and placement of trees that would obstruct navigation (Riddell 2004). The State of Texas considers land within the bed and banks of rivers to be public and requires access for the public to such areas. With the exception of the TCRA Site, which is required to be restricted to minimize the potential for disturbance of the armored cap by vehicular traffic or vandalism, the remedial alternatives will not limit public access. Documentation of compliance with this ARAR would entail documenting, with State concurrence, the extent to which a remedial alternative would affect navigability of the San Jacinto River in the vicinity of the site.

Coastal Zone Management Act and Texas Coastal Management Plan - Federal agency activities that have reasonably foreseeable effects on any land or water use or natural resource of the coastal zone (also referred to as coastal uses or resources and

coastal effects) must be consistent to the maximum extent practicable with the enforceable policies of a coastal State's Federally approved coastal management program (National Oceanic and Atmospheric Administration 2010). The Texas General Land Office administers the Texas Coastal Management Consistency certification process.

Action Specific

The action-specific ARARs are generally technology or activity-based limitations or guidelines for management of pollutants, contaminants, or hazardous wastes. These ARARs are triggered by the type of remedial activity selected to achieve the RAO and these requirements may indicate how the potential alternative must be achieved. Action-specific ARARs include CWA water quality certifications (Section 401) and discharges of dredged and fill material (Section 404), Clean Air Act, Endangered Species Act, and other wildlife protection acts.

Texas Pollutant Discharge Elimination System - Within the State of Texas, the National Pollutant Discharge Elimination System, which demonstrates compliance with Section 402 of the CWA, is administered by TCEQ and referred to as Texas Pollutant Discharge Elimination System. A Storm Water Pollution Prevention Plan in accordance with the general permit requirements of TXR150000 (permit for construction activities) will need to be prepared.

Noise Control Act - Noise abatement may be required if actions are identified as a public nuisance. Due to the TCRA Site being bounded by water on three sides and adjacent to a highway overpass on the fourth side and the industrial activities in the area south of the I-10, noise from the construction activity is unlikely to constitute a public nuisance. If necessary, BMPs would be implemented to reduce the noise levels. If materials are delivered to or removed from the project area by truck, noise greater than 60 decibels in close proximity to sensitive receptors (schools, residential areas, hospitals, and nursing homes) will be avoided. Truck routes will be selected to avoid sensitive receptors to the extent possible.

Hazardous Materials Transportation and Waste Management - The Selected Remedy includes removal and transportation of sediments to an off-site disposal facility. Off-site disposal would also be required for limited quantities of waste, such as used personal protective equipment and any debris or vegetated materials required to be removed during clearing and grading activities, associated with all of the remedial alternatives except for no further action. The contractor will be required to package any hazardous materials in appropriate containers and label containers in accordance with TxDOT requirements. The development of remedial alternatives anticipates that all disposal will be at a permitted landfill facility. If an off-site facility needs to be established for dewatering sediment or transloading waste from barges to trucks or rail cars, it may require a solid waste permit.

2.13.3 Cost Effectiveness

The Selected Remedy is cost-effective and represents a reasonable value for the costs incurred. In making this determination, the following definition was used: “A remedy shall be cost-effective if its costs are proportional to its overall effectiveness” (40 CFR 300.430(f)(1)(ii)(D)). EPA evaluated the “overall effectiveness” of those alternatives that satisfied the threshold criteria (i.e., were both protective of human health and the environment and ARAR-compliant) by assessing three of the five balancing criteria in combination (long-term effectiveness and permanence; reduction in toxicity, mobility, and volume through treatment; and short-term effectiveness). Overall effectiveness was then compared to costs to determine cost-effectiveness. The relationship of the overall effectiveness of this remedial alternative was determined to be proportional to its costs and hence this alternative represents a reasonable value for the money to be spent.

The total estimated net present value cost to implement the Selected Remedy is \$109 million. Less costly alternatives rely leaving principal threat wastes on-site in a river prone to flooding and hurricanes, therefore have greater uncertainty as to their long-term effectiveness.

2.13.4 Utilization of Permanent Solutions and Alternative Treatment (or Resource Recovery) Technologies to the Maximum Extent Practicable

EPA has determined that the Selected Remedy represents the maximum extent to which permanent solutions and treatment technologies can be utilized in a practicable manner at the site. Of those alternatives that are protective of human health and the environment and comply with ARARs, EPA has determined that the Selected Remedy provides the best balance of trade-offs in terms of the five balancing criteria, while also considering the statutory preference for treatment as a principal element and bias against off-site treatment and disposal and considering State and community acceptance.

2.13.5 Preference for Treatment as a Principal Element

The Selected Remedy satisfies the statutory preference for treatment as a principal element of the remedy. The NCP establishes the expectation that treatment will be used to address the principal threats posed by a site whenever practicable, (40 CFR 300.430[a] [1] [iii] [A]). In general, principal threat wastes are those source materials considered to be highly toxic or highly mobile that generally cannot be contained in a reliable manner, or will present a significant risk to human health or the environment should exposure occur. Excavated materials (both from the river and peninsula) will be stabilized prior to off-site disposal.

2.13.6 Five-Year Review Requirements

Because this remedy will result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, a statutory review will be

conducted within 5 years after initiation of remedial action to ensure that the remedy is, or will be, protective of human health and the environment.

2.14 DOCUMENTATION OF SIGNIFICANT CHANGES

To fulfill CERCLA §117(b) and NCP §§300.430(f)(5)(iii)(B) and 300.430(f)(3)(ii)(A), the ROD must document and discuss the reasons for any significant changes made to the Selected Remedy. Changes described in this section are limited to those that could have been reasonably anticipated by the public from the time the Proposed Plan and RI/FS Report were released for public comment to the final selection of the remedy. Changes that could not have been anticipated require an additional public comment period.

Per EPA ROD guidance (1999), the text in this section should be as follows based on whether or not significant changes occur. If no significant changes occur, “The Proposed Plan for the San Jacinto Waste Pits Site was released for public comment in [ENTER DATE]. The Proposed Plan for the San Jacinto Waste Pits Site was released for public comment in [ENTER DATE]. The Proposed Plan identified FS Alternative 6N, full removal of materials exceeding the sediment cleanup goal, as the Preferred Alternative for impoundments north of I-10. The Proposed Plan also identified FS Alternative 4S, removal of materials exceeding soil cleanup goal to a depth of 10 feet below grade, as the Preferred Alternative for the impoundment south of I-10. EPA reviewed all written and verbal comments submitted during the public comment period. It was determined that no significant changes to the remedy, as originally identified in the Proposed Plan, were necessary or appropriate.”

If a significant change occurs that requires only documentation in the ROD, the text should be as follows, “The Proposed Plan for the San Jacinto Waste Pits Site was released for public comment in [ENTER DATE]. The Proposed Plan identified FS Alternative 6N, full removal of materials exceeding the sediment cleanup goal, as the Preferred Alternative for impoundments north of I-10. The Proposed Plan also identified FS Alternative 4S, removal of materials exceeding soil cleanup goal to a depth of 10 feet below grade, as the Preferred Alternative for the impoundment south of I-10. During the public comment period, new information indicated [ENTER NEW INFORMATION AND CHANGES MADE BASED ON NEW INFORMATION].

If significant changes requiring a new public comment period are made, the text should be as follows, “The Proposed Plan for the San Jacinto Waste Pits Site was released for public comment in [ENTER DATE]. The Proposed Plan identified FS Alternative 6N, full removal of materials exceeding the sediment cleanup goal, as the Preferred Alternative for impoundments north of I-10. The Proposed Plan also identified FS Alternative 4S, removal of materials exceeding soil cleanup goal to a depth of 10 feet below grade, as the Preferred Alternative for the impoundment south of I-10. During the public comment period, [ENTER NEW INFORMATION IDENTIFIED]. Supporting information regarding this is available in the Administrative Record file.

As a result of this new information, EPA decided to propose [ENTER NEW REMEDY SELECTED] as the new Preferred Alternative. The TCEQ was provided the opportunity review and comment on the Selected Remedy. In compliance with statutory requirements for ensuring the public has the opportunity to comment on major remedy selection decisions, a new Proposed Plan was prepared presenting [ENTER DESCRIPTION OF NEW REMEDY SELECTED] as the Preferred Alternative. The second Proposed Plan was made available to the public in [ENTER DATE]. No significant comments were received during the second public comment period, and no significant changes were made to the proposed remedy.”

PART 3: RESPONSIVENESS SUMMARY

The Responsiveness Summary summarizes information about the views of the public and support agency regarding both the remedial alternatives and general concerns about the site submitted during the public comment period.

3.1 STAKEHOLDER ISSUES AND LEAD AGENCY RESPONSES

This section requires completion after the public comment period.

Summarize and respond concisely to major issues raised by stakeholders (e.g., community groups, support agencies, businesses, municipalities, potentially responsible parties).

3.2 TECHNICAL AND LEGAL ISSUES

This section requires completion after the public comment period.

Expand on technical and legal issues, if necessary.

REFERENCES

- Anchor QEA, LLC. 2011. *Operations, Monitoring, and Maintenance Plan, Time Critical Removal Action, San Jacinto River Waste Pits Superfund Site*. Prepared for: McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency, Region 6. October.
- Anchor QEA, LLC and Integral Consulting Inc. 2010. *Final Remedial Investigation/Feasibility Study Work Plan San Jacinto River Waste Pits Superfund Site*. Prepared for: McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency, Region 6. November.
- Clark, R.D., T.J. Minello, J.D. Christensen, P.A. Caldwell, M.E. Monaco, and G.A. Matthews. 1999. *Modeling Nekton Habitat Use in Galveston Bay, Texas: An Approach to Define Essential Fish Habitat (EFH)*. National Oceanic and Atmospheric Administration/National Ocean Service Biogeography Program, Silver Spring, MD, and NMFS, Galveston, TX.
- ENSR Consulting and Engineering and Espey, Huston and Associates. 1995. *Houston Ship Channel Toxicity Study Project Report*. Document Number 1591R001.01. June.
- Frame G.M., J.W. Cochran, and S.S. Boewadt. 1996. *Complete PCB Congener Distributions for 17 Aroclor Mixtures Determined by 3 HRGC Systems Optimized for Comprehensive, Quantitative, Congener-Specific Analysis*. *Journal of High Resolution Chromatography*. 19:657-668.
- Fetter, C.W. 1994. *Applied Hydrogology 3rd Edition*. Prentice Hall, Upper Saddle River, NJ.
- Freeze, A.R. and J.A. Cherry. 1979. *Groundwater*. Prentice-Hall, Englewood Cliffs, NJ.
- Gardiner, J., B. Azzato, and M. Jacobi (editors). 2008. *Coastal and Estuarine Hazardous Waste Site Reports, September 2008*. Seattle: Assessment and Restoration Division, Office of Response and Restoration, National Oceanic and Atmospheric Administration.
- Integral Consulting Inc. 2010. *Technical Memorandum on Bioaccumulation Modeling, San Jacinto River Waste Pits Superfund Site*. Prepared for U.S. Environmental Protection Agency, Region 6, on behalf of McGinnes Industrial Maintenance Corporation and International Paper Company. September.

- _____. 2012. *Toxicological and Epidemiological Studies Memorandum, San Jacinto River Waste Pits Superfund Site*. Prepared for: McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency, Region 6. May.
- _____. 2013. *Baseline Ecological Risk Assessment, San Jacinto River Waste Pits Superfund Site*. Prepared for: McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency, Region 6. May.
- Integral Consulting Inc. and Anchor QEA, LLC. 2013a. *Remedial Investigation Report, San Jacinto River Waste Pits Superfund Site*. Prepared for: McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency, Region 6. May.
- _____. 2013b. *Baseline Human Health Risk Assessment, San Jacinto River Waste Pits Superfund Site*. Prepared for: McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency, Region 6. May.
- Joint Food and Agriculture Organization/World Health Organization Expert Committee on Food Additives. 2002. *Polychlorinated dibenzodioxins, polychlorinated dibenzofurans, and coplanar polychlorinated biphenyls*. WHO Food Additives Series 48.
- Khoury. 2016. E-mail to Carlos Sanchez. Diamond Alkali Phase I and SJRWP. March.
- Maynard. 2000.
- National Oceanic and Atmospheric Administration. 1995. *San Jacinto River Bathymetric Survey H10619, June 13 – September 13, 1995*.
- _____. 2010. Federal Consistency Overview. Updated: March 10, 2010. Available from: https://coast.noaa.gov/czm/consistency/media/FC_overview_022009.pdf Accessed July 2013.
- Texas Commission on Environmental Quality (TCEQ). 2005. *Preliminary Assessment/Screening Site Inspection Work Plan, San Jacinto River Waste Pits, Houston, Harris County, Texas, EPA ID# TXN000606611*. Prepared in cooperation with the U.S. Environmental Protection Agency. August.
- _____. 2006. *Screening Site Inspection Report, San Jacinto River Waste Pits, Channelview, Harris County, Texas, TXN000606611*. Prepared in cooperation with the U.S. Environmental Protection Agency. September.

- _____. 2007. *HRS Documentation Record, San Jacinto River Waste Pits, Harris County, Texas, TXN000606611*. Prepared in cooperation with the U.S. Environmental Protection Agency. September.
- Texas Department of State Health Services (TDSHS). 2005. *Characterization of Potential Health Risks Associated with Consumption of Fish or Blue Crabs from the Houston Ship Channel, the San Jacinto River (Tidal Portions, Tabbs Bay, and Upper Galveston Bay)*. Texas Department of State Health Services, Seafood and Aquatic Life Group, Policy, Standards, and Quality Assurance Unit and Regulatory Services Division. Austin, TX.
- Texas Natural Resource Conservation Commission. 1999. *Surface Water/Groundwater Interaction Evaluation for 22 Texas River Basins*. Prepared by Parsons Engineering Science, Inc., Austin, Texas. July.
- Texas Parks and Wildlife Department (TPWD). 2005. Letter from Larry D. McKinney, Ph.D. to Faith Hambleton, Texas Commission on Environmental Quality. RE: Dioxin in the San Jacinto River at the Interstate Highway-10 Bridge. 14 April.
- _____. 2009. *2009-2010 Texas Commercial Fishing Guide*. Austin.
- Texas State Historical Association. 2009. The San Jacinto River. Accessed at: <http://www.tshaonline.org/handbook/online/articles/SS/rns9.html>. Accessed on 25 December 2009.
- University of Houston, Parsons Engineering, and PBS&J. 2004. *Total Maximum Daily Loads for Dioxins in the Houston Ship Channel*. Prepared for the Texas Commission on Environmental Quality, Total Maximum Daily Load Program. January.
- Usenko, S., B. Brooks, E. Bruce, and S. Williams. 2009. *Defining Biota-Sediment Accumulation Factors for the San Jacinto River Waste Pits, Texas Project Work Plan and QAQC Procedures*. Center for Reservoir and Aquatic Systems Research and Department of Environmental Science, Baylor University. September 2009.
- U.S. Army Corps of Engineers (USACE). 2013. *Review of Design, Construction and Repair of TCRA Armoring for the West Berm of San Jacinto Waste Pits*. Prepared for U.S. Environmental Protection Agency, Region 6. U.S. Army Corps of Engineers Engineer Research and Development Center. Vicksburg, Mississippi. October.
- U.S. Environmental Protection Agency (EPA). 1992. *Hazard Ranking System Guidance Manual*. Office of Solid Waste and Emergency Response. EPA 540-R-92-026. OSWER Directive 9345.1-07. November.

- _____. 2009. *Unilateral Administrative Order for Remedial Investigation/Feasibility Study*. U.S. EPA Region 6 CERCLA Docket No. 06-03-10. In the matter of: San Jacinto River Waste Pits Superfund Site Pasadena, Texas. International Paper Company, Inc. & McGinnes Industrial Management Corporation, respondents.
- _____. 2010a. *Recommended Toxicity Equivalence Factors (TEFs) for Human Health Risk Assessments of 2,3,7,8-Tetrachlorodibenzo-p-Dioxins and Dioxin-Like Compounds*. EPA/100/R-10/005. U.S. Environmental Protection Agency, Risk Assessment Forum. Washington, DC.
- _____. 2010b. *Administrative Settlement Agreement and Order on Consent for Removal Action*. U.S. EPA Region 6 CERCLA Docket No. 06-12-10. In the matter of: San Jacinto River Waste Pits Superfund Site Pasadena, Harris County, Texas. International Paper Company, Inc. & McGinnes Industrial Management Corporation, respondents.
- _____. 2010c. *Draft EPA's Reanalysis of Key Issues Related to Dioxin Toxicity and Response to NAS Comments*. EPA/600/R-10-038A. U.S. Environmental Protection Agency, Office of Research and Development. Cincinnati, OH.
- _____. 2012. *Revised Final Removal Action Completion Report, San Jacinto River Waste Pits Superfund Site*. May.
- _____. 2016. *Final Interim Feasibility Study Report, San Jacinto River Waste Pits Superfund Site*. May.
- U.S. Geological Society. 2002. *Hydrogeology and Simulation of Ground-Water Flow and Land-Surface Subsidence in the Chicot and Evangeline Aquifers, Houston Area, Texas Water-Resources Investigations Report 02-4022*. Department of the Interior.
- Van den Berg, M., L.S. Birnbaum, M. Denison, M. DeVito, W. Farland, M. Feeley, H. Fiedler, H. Hakansson, A. Hanberg, L. Haws, M. Rose, S. Safe, D. Schrenk, C. Tohyama, A. Tritscher, J. Tuomisto, M. Tysklind, N. Walker, R. E. Peterson. 2006. The 2005 World Health Organization Reevaluation of Human and Mammalian Toxic Equivalency Factors for Dioxins and Dioxin-Like Compounds. *Toxicological Sciences*. 93(2):223-241.
- Van Sicken, D.C. 1991. *Surficial Geology of the Houston Area: An Offlapping Series of Pleistocene (& Pliocene?) Highest-Sealevel Fluviodeltaic Sequences*. Gulf Coast Association of Geological Societies 41st Annual Convention, Transactions 41, Houston, Texas.

TABLES

FIGURES

Appendix A: Remedial Alternative Cost Development